Documents

for

FOIA request #EPA-R6-2014-002460

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

DATE: **August 6, 2012**

SUBJECT: **Transmittal Memo – Compliance Monitoring Report**

FROM: Carol Peters, Chief
NPDES Industrial & Municipal Section (6EN-WM)

TO: Paulette Johnsey, Chief
NPDES Compliance Monitoring Section (6EN-WC)

A Compliance Evaluation Inspection was conducted on June 11, 2012 at the following location:

FACILITY NAME: **Louisiana Land & Water Co Inc – Cooper Lake/Lakeview Subdivision STP**

ADDRESS: **2,000 ft. East of Ridge Lane**

CITY: **Bastrop, LA 71220**

INSPECTOR: **Robert Houston**

Received
AUG 06 2012
6EN-W

TYPE FACILITY: FEDERAL( ) MUNICIPAL(X) NON-MUNICIPAL( )

Compliance monitoring reports attached: (Check appropriate box)

NPDES #: LAG540333

( )MAJOR ( )NOD ( )CSI ( )PAI ( )BIO
(X)MINOR (X)CEI ( )CSI-TOXICS ( )STORMWATER

COMMENTS:

08/7/12

United States Environmental Protection Agency
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3	L A G 5 4 0 3 3 3	1 2 0 6 1 1 17	18 C	19 R	20 1

21 S I C 4 9 5 2 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 1	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Louisiana Land & Water Co Inc **Cooper Lake/Lakeview Subdivision STP** **2000 ft East of Ridge Lane** **Bastrop, LA 71220**	**4:40 PM/ June 11, 2012**	**July 1, 2008**
	Exit Time/Date **4:51 PM/ June 11, 2012**	Permit Expiration Date **June 30, 2013**

Name(s) of On-Site Representatives	Title(s)	Phone Number(s)
David Shelborne, LWC	**Laborer**	**(318) 805-8714**
Brad Osborn, DEQ	**Staff**	**(318) 362-5439**
John Posey, DEQ	**Staff Scientist DCLA**	**(318) 362-5438**
Racquel Douglas, EPA	**Environmental Engineer**	**(214) 665-6579**
Robert Houston, EPA	**Environmental Engineer**	**(214) 665-8565**

Name, Address of Responsible Official	Title	
Brandy Pruett **Louisiana Land & Water Co Inc** **2800 North 7th Street** **West Monroe, LA 71291**	**Business Manager**	
	Phone Number **(318) 397-2835**	Contacted: YES √ NO ____

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Storm Water	N	CSO/SSO (Sewer Overflow)
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	U	Operations & Maintenance		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report for summary of findings during the inspection.

Attachment: Photograph Log

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Robert Houston Robert Houston	**USEPA / 6EN-WM / 214-665-8565**	**August 2, 2012**
Signature of Reviewer **Racquel Douglas** Racquel Douglas	Agency/Office **USEPA / 6EN-WM / 214-665-6579**	Date **August 2, 2012**

NPDES Inspection Report Information

Company Name:	Louisiana Land & Water Co Inc
Facility Name:	Cooper Lake/Lakeview Subdivision STP
LPDES Permit Number:	LAG540333
AI Number:	85975
Mailing Address:	2800 North 7th Street, West Monroe, LA 71291
Facility Address:	2000 ft East of Ridge Lane, Bastrop, LA 71220
Type of Facility:	Single-cell, aerated oxidation pond with tablet chlorination

Louisiana Land & Water Co Inc Personnel:

David Shelborne	Laborer	(318) 805-8714

DEQ Personnel:

Brad Osborn	Staff	(318) 362-5439
John Posey	Staff Scientist DCLA	(318) 362-5438

U.S. EPA Personnel:

Racquel Douglas	Region 6 Water Enforcement	(214) 665-6579
Robert Houston	Region 6 Water Enforcement	(214) 665-8565

Summary of Findings

Introduction

On June 11, 2012, an unannounced Compliance Evaluation Inspection (CEI) was conducted by the Environmental Protection Agency (EPA) at the Louisiana Land & Water Co Inc (LWC) – Cooper Lake/Lakeview Subdivision STP wastewater treatment facility (WWTF). The inspection CEI was to determine LPDES General Sanitary Class II permit compliance for LAG540333. This inspection was conducted in conjunction with several other evaluations of plants owned and operated by LWC. Initial contact was made at the LWC main office. EPA requested a company representative meet EPA at the WWTF. David Shelborne, a company representative, was sent to assist with the CEI.

The WWTF is located 2,000 feet east of Ridge Lane on Cooper Lake Road in Bastrop, Morehouse Parish, Louisiana. The WWTF is a single-cell, aerated oxidation pond with tablet chlorination and serves an estimated population of 103 people. Flow discharges from the facility into an unnamed ditch, thence into Cypress Bayou in subsegment 080401 of the Ouachita River Basin.

Areas of Concern

During the inspection, the Inspector noticed the following:

- The WWTF discharged at the time of inspection.
- Failed to perform maintenance on the discharge pipe.
- Failed to perform maintenance on the chlorine contact chamber (no lid, no support, and no chlorine in tubes).
- Failed to have an aerator in the pond.
- Failed to remove overgrown vegetation in the pond.
- Failed to prevent solid sludge formation in the pond.
- Failed to secure manhole.
- Failed to secure entrance to the wastewater treatment facility.

On June 15, 2012, at 1:26 PM, EPA conducted an exit interview with Brandy Pruett. During the exit interview, credentials were presented and areas of concern were discussed. EPA also requested to review Discharge Monitoring Reports, Laboratory Records, Calibration Records, and Maintenance Records. LWC provided Discharge Monitoring Reports and Laboratory Records, but failed to provide Calibration Records and Maintenance Records. LWC also failed to provide current certification for LWC's Operators.

Photo Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 1 of 11

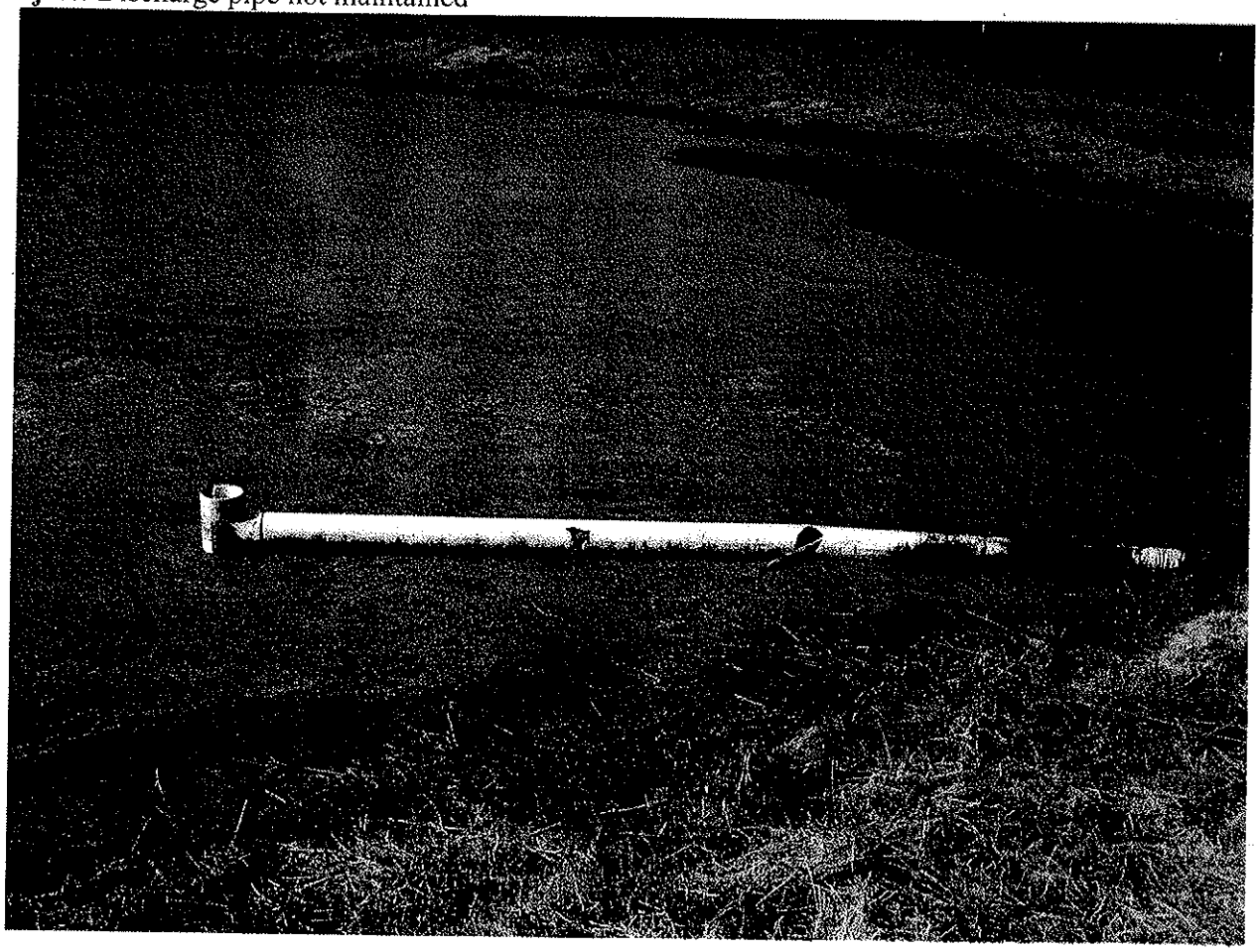
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:41 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Discharge pipe not maintained



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 2 of 11

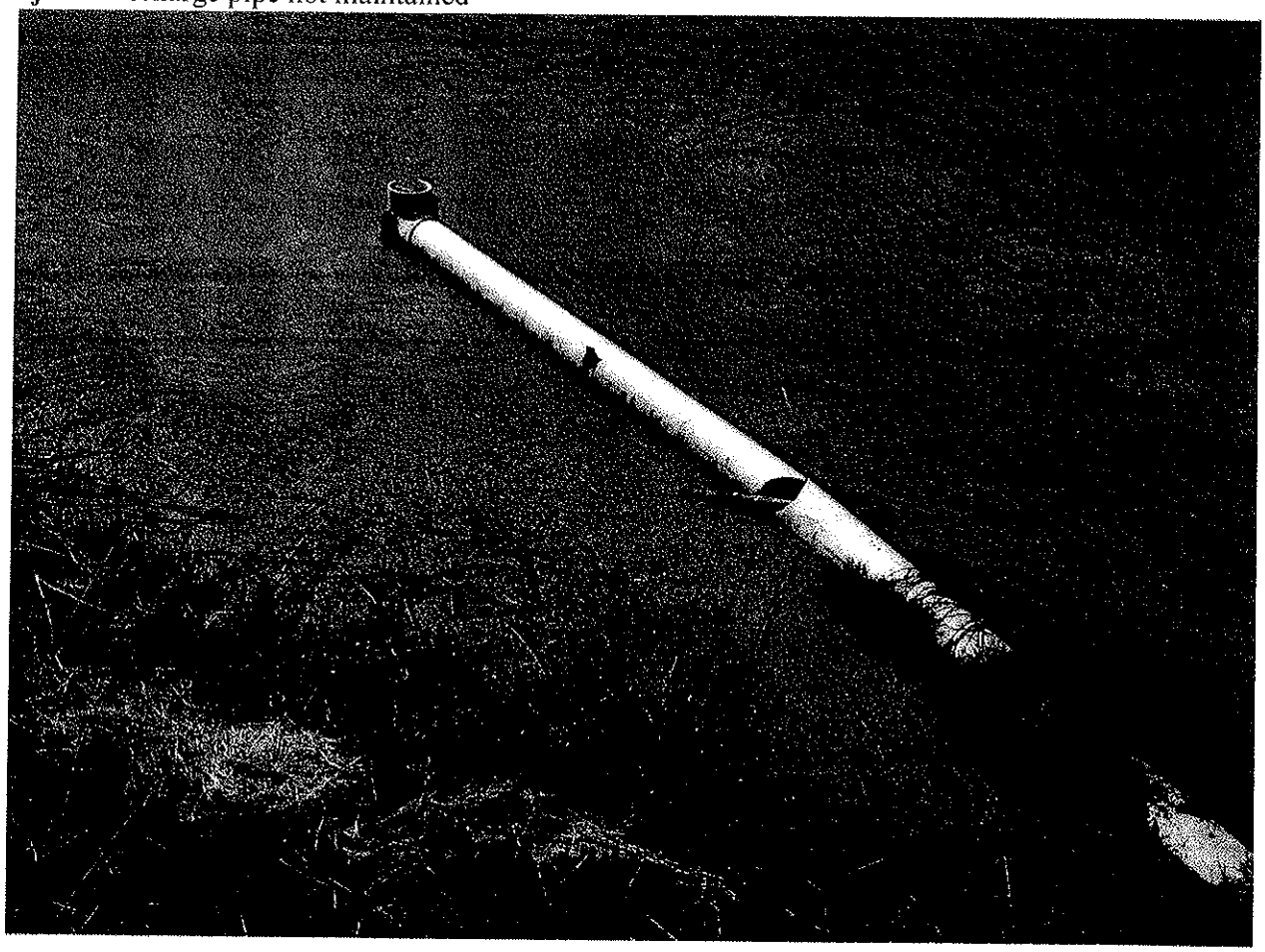
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:47 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Discharge pipe not maintained



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 3 of 11

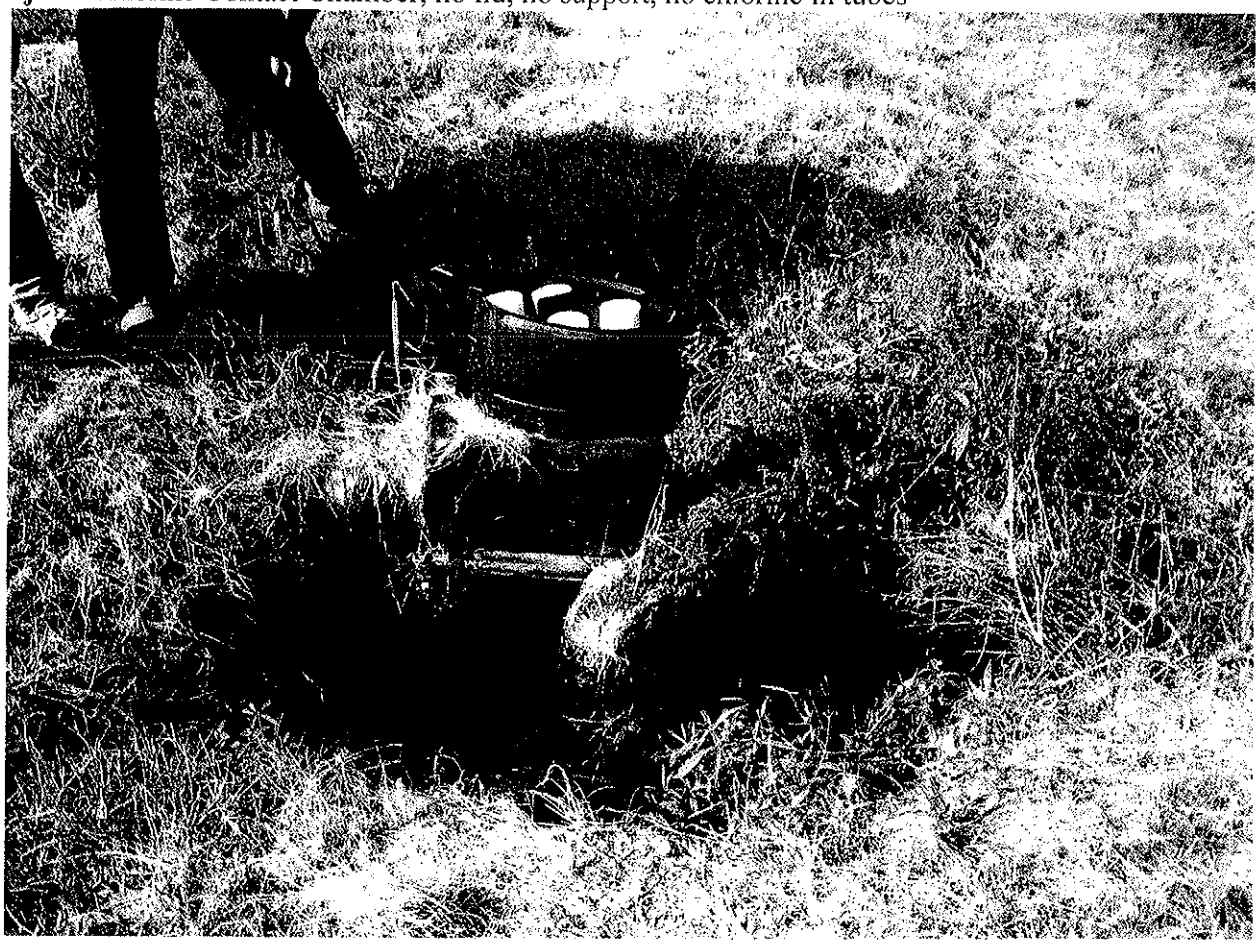
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:42 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Chlorine Contact Chamber; no lid, no support, no chlorine in tubes



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 4 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:43 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Chlorine Contact Chamber; no lid, no support, no chlorine in tubes

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 5 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:44 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Chlorine Contact Chamber; no lid, no support, no chlorine in tubes

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 6 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:47 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Oxidation Pond, no aerator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 7 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:47 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Oxidation Pond, no aerator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 8 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:48 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Overgrown oxidation pond banks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 9 of 11

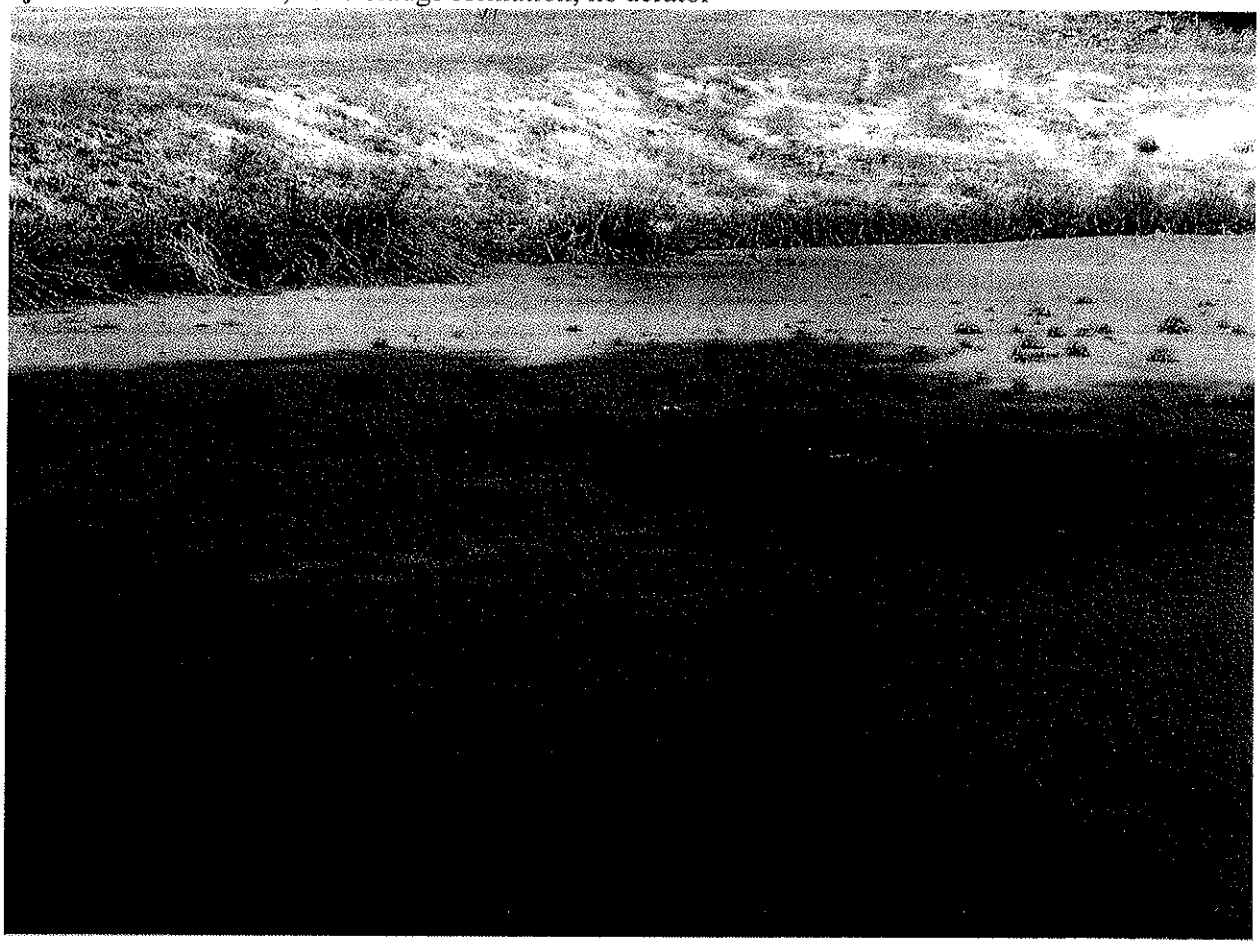
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:49 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Oxidation Pond, solid sludge formation, no aerator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 10 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:51 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Manhole not secure, partially open

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 11 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 4:51 PM

Location: Cooper Lake/Lakeview Subdivision STP **City/County:** Bastrop **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Entrance to the wastewater treatment facility not secure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

DATE: **August 6, 2012**

SUBJECT: **Transmittal Memo – Compliance Monitoring Report**

FROM: Carol Peters, Chief
NPDES Industrial & Municipal Section (6EN-WM)

TO: Paulette Johnsey, Chief
NPDES Compliance Monitoring Section (6EN-WC)

A Compliance Evaluation Inspection was conducted on June 11, 2012 at the following location:

FACILITY NAME: **Louisiana Land & Water Co Inc – Branch Crossing STP**

ADDRESS: **3 Baker Ln & Branch Crossing Rd**

CITY: **Rayville, LA 71269**

INSPECTOR: **Robert Houston**

TYPE FACILITY: FEDERAL( ) MUNICIPAL(X) NON-MUNICIPAL( )

Compliance monitoring reports attached: (Check appropriate box)

NPDES #: LAG541478

( )MAJOR	( )NOD	( )CSI	( )PAI	( )BIO
(X)MINOR	(X)CEI	( )CSI-TOXICS	( )STORMWATER	

COMMENTS:

08/7/12

United States Environmental Protection Agency
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
N	5	LAG541478	120611	C	R	1

21 | S | I | C | | 4 | 9 | 5 | 2 | 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
	1	N	N	

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Louisiana Land & Water Co Inc **Branch Crossing STP** **3 Baker Ln & Branch Crossing Rd** **Rayville, LA 71269**	**6:33 PM/ June 11, 2012** **5:01 PM/ June 13, 2012**	**July 1, 2008**
	Exit Time/Date	Permit Expiration Date
	6:42 PM/ June 11, 2012 **5:06 PM/ June 13, 2012**	**June 30, 2013**

Name(s) of On-Site Representatives	Title(s)	Phone Number(s)
David Shelborne, LWC	**Laborer**	**(318) 805-8714**
Brad Osborn, DEQ	**Staff**	**(318) 362-5439**
John Posey, DEQ	**Staff Scientist DCLA**	**(318) 362-5438**
Racquel Douglas, EPA	**Environmental Engineer**	**(214) 665-6579**
Robert Houston, EPA	**Environmental Engineer**	**(214) 665-8565**

Name, Address of Responsible Official	Title	
Brandy Pruett **Louisiana Land & Water Co Inc** **2800 North 7th Street** **West Monroe, LA 71291**	**Business Manager**	
	Phone Number **(318) 397-2835**	Contacted: YES √ NO

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Storm Water	N	CSO/SSO (Sewer Overflow)
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	U	Operations & Maintenance		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report for summary of findings during the inspection.

Attachment: Photograph Log

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Robert Houston Robert Houston	**USEPA / 6EN-WM / 214-665-8565**	**August 2, 2012**
Signature of Reviewer **Racquel Douglas** Racquel Douglas	Agency/Office **USEPA / 6EN-WM / 214-665-6579**	Date **August 2, 2012**

NPDES Inspection Report Information

Company Name:	Louisiana Land & Water Co Inc
Facility Name:	Branch Crossing STP
LPDES Permit Number:	LAG541478
AI Number:	43675
Mailing Address:	2800 North 7th Street, West Monroe, LA 71291
Facility Address:	3 Baker Ln & Branch Crossing Rd, Rayville, LA 71269
Type of Facility:	Extended aeration, activated sludge, mechanical treatment plant with gas chlorination

Louisiana Land & Water Co Inc Personnel:

David Shelborne	Laborer	(318) 805-8714

DEQ Personnel:

Brad Osborn	Staff	(318) 362-5439
John Posey	Staff Scientist DCLA	(318) 362-5438

U.S. EPA Personnel:

Racquel Douglas	Region 6 Water Enforcement	(214) 665-6579
Robert Houston	Region 6 Water Enforcement	(214) 665-8565

Summary of Findings

Introduction

On June 11, 2012, and June 13, 2012, an unannounced Compliance Evaluation Inspection (CEI) was conducted by the Environmental Protection Agency (EPA) at the Louisiana Land & Water Co Inc (LWC) – Branch Crossing STP wastewater treatment facility (WWTF). The inspection CEI was to determine LPDES General Sanitary Class II permit compliance for LAG541478. This inspection was conducted in conjunction with several other evaluations of plants owned and operated by LWC. Initial contact was made at the LWC main office. EPA requested a company representative meet EPA at the WWTF. On June 11, 2012, LWC did not send a company representative. On June 13, 2012, David Shelborne, a company representative, was sent to assist with the CEI.

The WWTF is located at 3 Baker Lane & Branch Crossing Road in Rayville, Richland Parish, Louisiana. The WWTF is an extended-aeration, mechanical treatment plant with gas chlorination and serves an estimated population of 28 people. Flow discharges from a pipe into an unnamed ditch, thence into Burns Bayou, thence into Bee Bayou in segment 080903 of the Ouachita River Basin.

Areas of Concern

During the inspection, the Inspector noticed the following:

- The WWTF discharged at the time of inspection.
- Failed to prevent solids from traveling past the weirs.
- Visible solids exiting the treatment facility.

On June 15, 2012, at 1:26 PM, EPA conducted an exit interview with Brandy Pruett. During the exit interview, credentials were presented and areas of concern were discussed. EPA also requested to review Discharge Monitoring Reports, Laboratory Records, Calibration Records, and Maintenance Records. LWC provided Discharge Monitoring Reports and Laboratory Records, but failed to provide Calibration Records and Maintenance Records. LWC also failed to provide current certification for LWC's Operators.

Photo Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 1 of 11

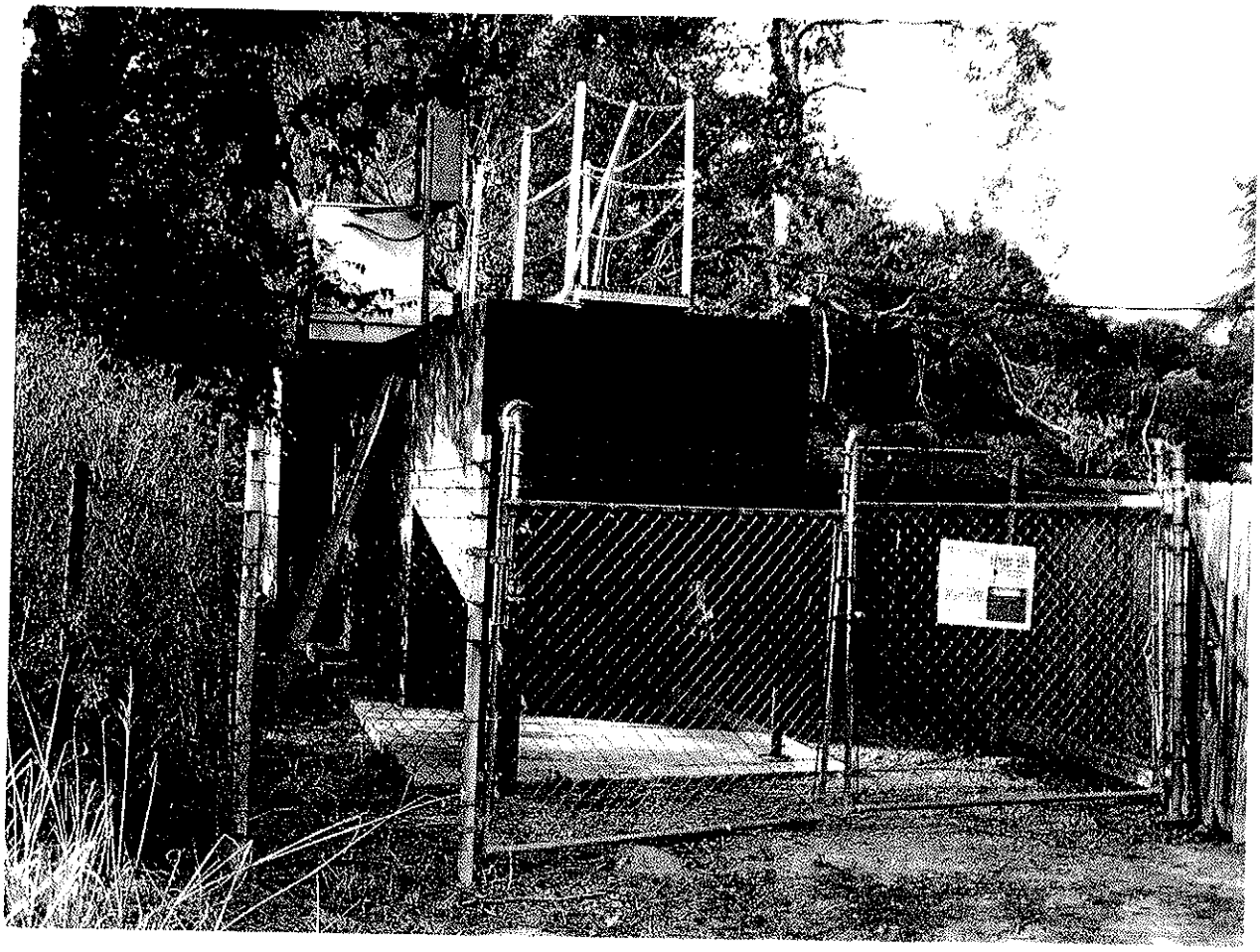
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 6:33 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 95.0 °F **Conditions:** Clear

Subject: Branch Crossing Sewage Treatment Plant



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 2 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 6:34 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 95.0 °F **Conditions:** Clear

Subject: Discharge into ditch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 3 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 6:36 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 95.0 °F **Conditions:** Clear

Subject: Discharge into ditch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 4 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 6:42 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 95.0 °F **Conditions:** Clear

Subject: Discharge into ditch

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 5 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:01 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Chlorine located in storage area

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

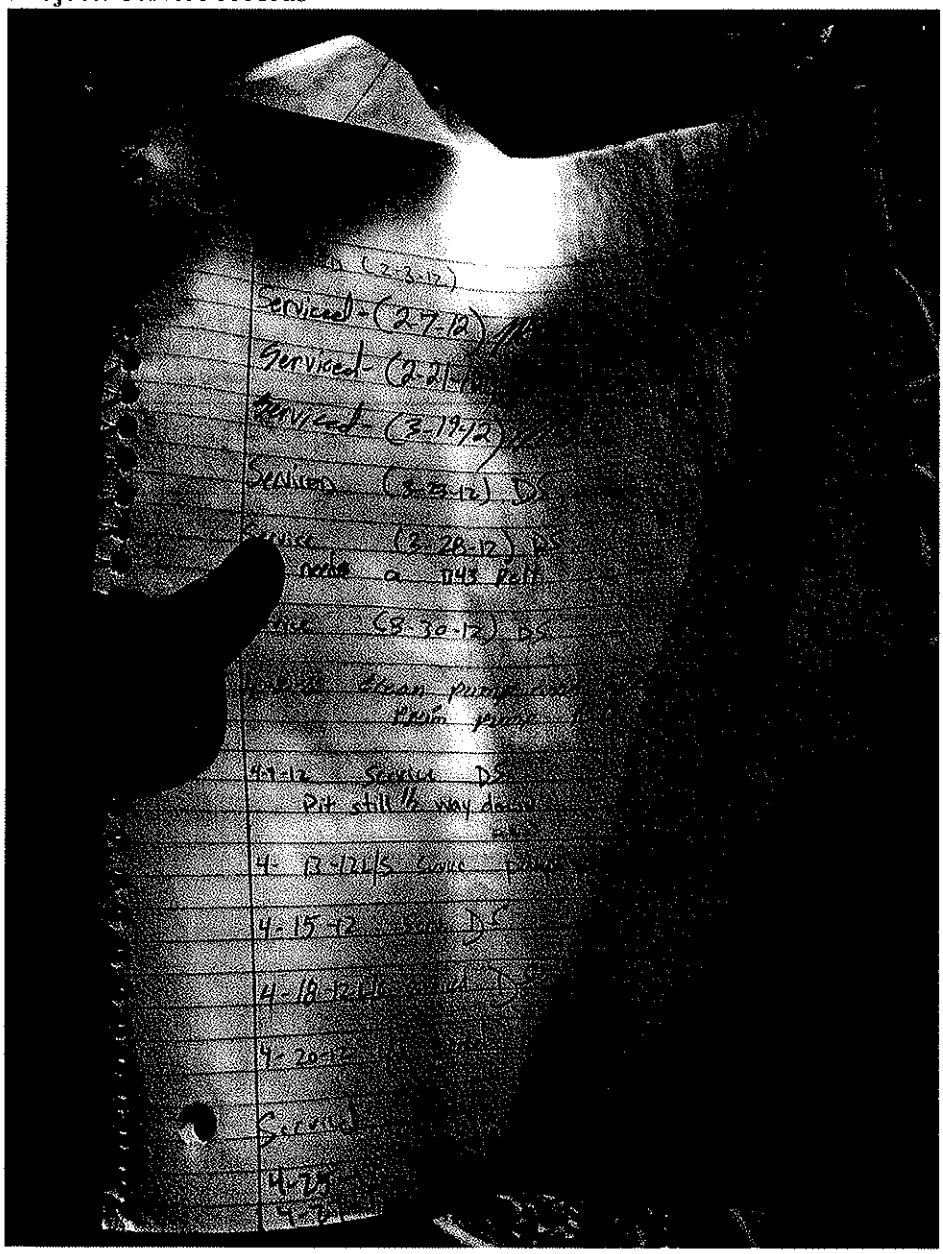
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 6 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:02 PM
Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana
Weather: 89.1 °F **Conditions:** Partly Cloudy
Subject: Service records



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 7 of 11

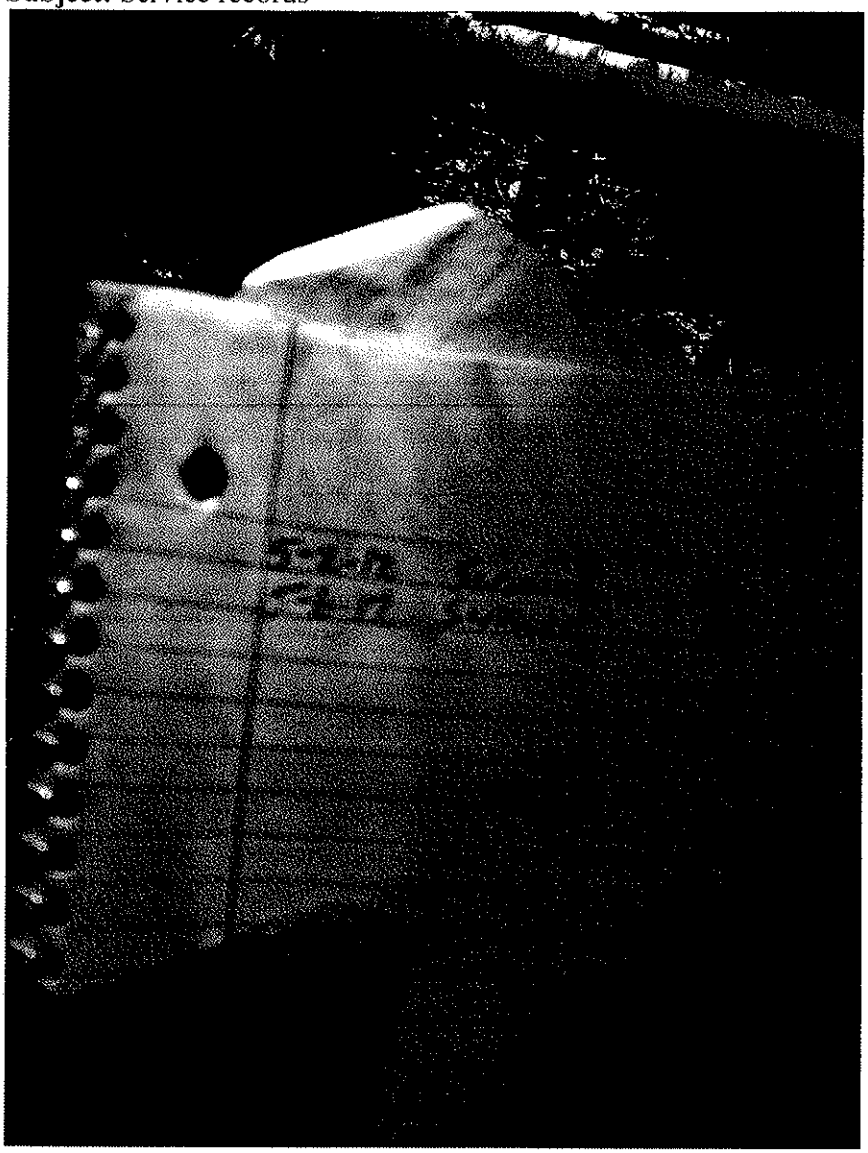
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:03 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Service records



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Official Photograph Log
Photo: 8 of 11

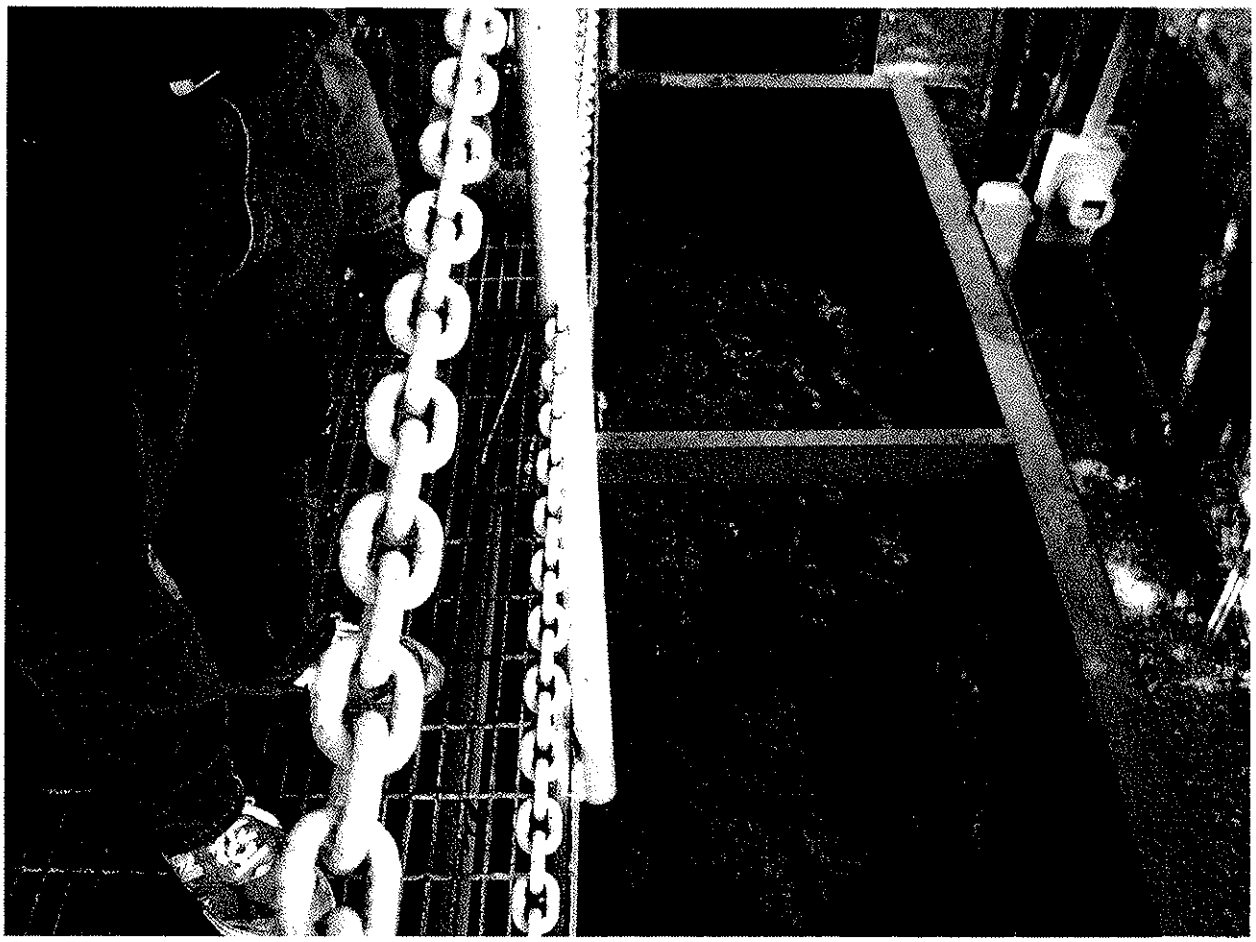
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:04 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Sewage Treatment Plant



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
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Dallas, Texas 75202-2733

Official Photograph Log
Photo: 9 of 11

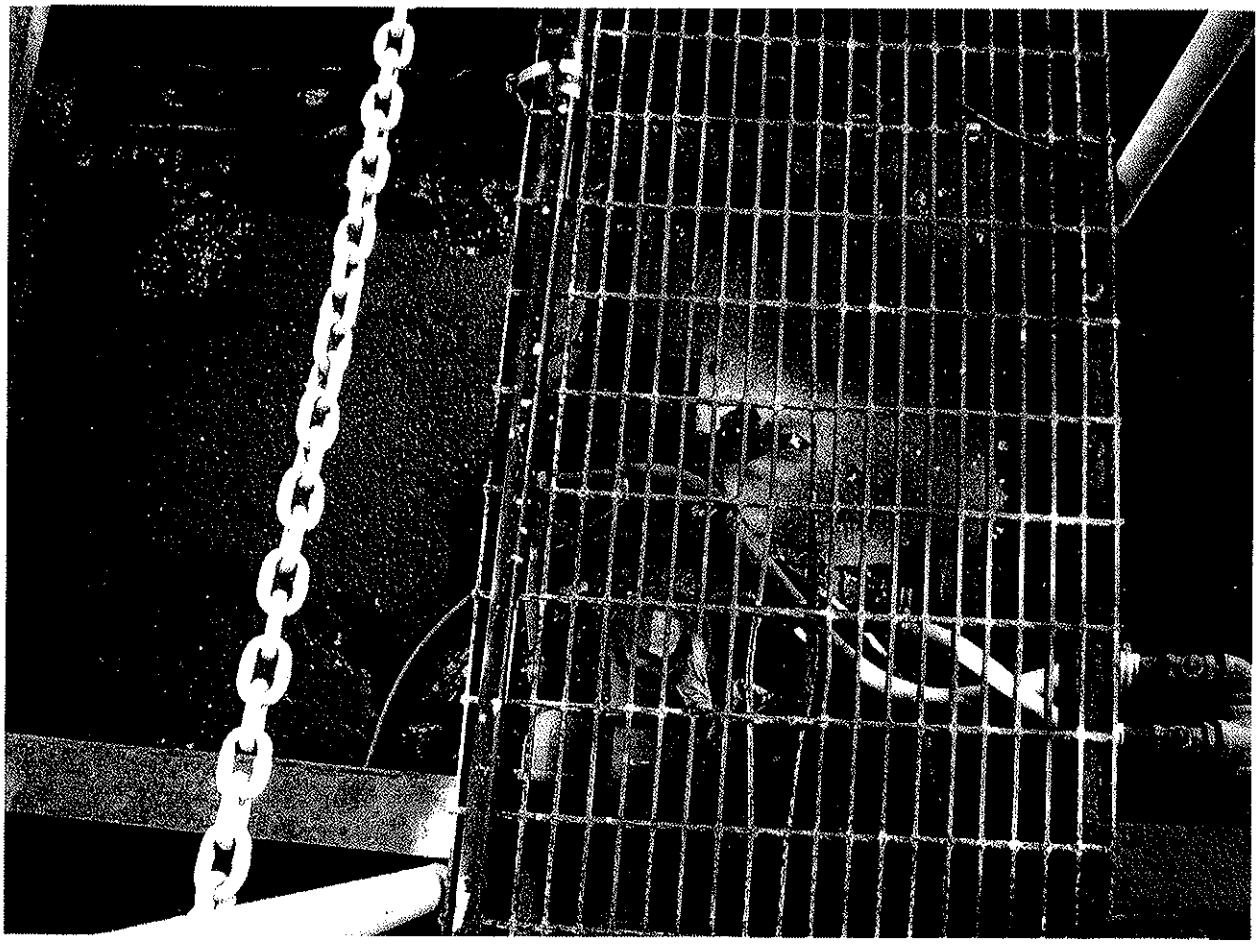
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:05 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Solids and debris located in the sewage treatment plant



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 10 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:06 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Solids and debris located in the sewage treatment plant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 11 of 11

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 13, 2012 **Time:** 5:06 PM

Location: Branch Crossing STP **City/County:** Rayville **State:** Louisiana

Weather: 89.1 °F **Conditions:** Partly Cloudy

Subject: Solids and debris located in the sewage treatment plant

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

DATE: **August 22, 2012**

SUBJECT: **Transmittal Memo – Compliance Monitoring Report**

FROM: Carol Peters, Chief
NPDES Industrial & Municipal Section (6EN-WM)

TO: Paulette Johnsey, Chief
NPDES Compliance Monitoring Section (6EN-WC)

A Compliance Evaluation Inspection was conducted on June 12, 2012 at the following location:

FACILITY NAME: **Louisiana Land & Water Co Inc – Woodland Acres Sewer #1**

ADDRESS: **1 Mi E of Peach Orchard Rd**

CITY: **Bastrop, LA 71220**

INSPECTOR: **Robert Houston**

TYPE FACILITY: FEDERAL( ) MUNICIPAL(X) NON-MUNICIPAL( )

Compliance monitoring reports attached: (Check appropriate box)

NPDES #: LAG540758

( )MAJOR	( )NOD	( )CSI	( )PAI	( )BIO
(X)MINOR	(X)CEI	( )CSI-TOXICS	( )STORMWATER	

COMMENTS:

United States Environmental Protectio ency
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3	L A G 5 4 0 7 5 8	1 2 0 6 1 2 17	18 C	19 R	20 1

21 S I C 4 9 5 2 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 1	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Louisiana Land & Water Co Inc **Woodland Acres Sewer #1** **1 Mi E of Peach Orchard Rd** **Bastrop, LA 71220**	**3:41 PM / June 12, 2012**	**July 1, 2008**
	Exit Time/Date **4:02 PM / June 12, 2012**	Permit Expiration Date **June 30, 2013**

Name(s) of On-Site Representatives	Title(s)	Phone Number(s)
Casey Head, DEQ	**Manager**	**(318) 362-5448**
Racquel Douglas, EPA	**Environmental Engineer**	**(214) 665-6579**
Robert Houston, EPA	**Environmental Engineer**	**(214) 665-8565**

Name, Address of Responsible Official	Title	
Brandy Pruett **Louisiana Land & Water Co Inc** **2800 North 7th Street** **West Monroe, LA 71291**	**Business Manager**	
	Phone Number **(318) 397-2835**	Contacted: YES __√__ NO ____

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Storm Water	N	CSO/SSO (Sewer Overflow)
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	U	Operations & Maintenance		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report for summary of findings during the inspection.

Attachment: Photograph Log

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Robert Houston	**USEPA / 6EN-WM / 214-665-8565**	**August 22, 2012**
Signature of Reviewer **Anthony M. Loston**	Agency/Office **USEPA / 6EN-WM / 214-665-6579**	Date **August 22, 2012**

NPDES Inspection Report Information

Company Name:	Louisiana Land & Water Co Inc
Facility Name:	Woodland Acres Sewer #1
LPDES Permit Number:	LAG540758
AI Number:	43777
Mailing Address:	2800 North 7th Street, West Monroe, LA 71291
Facility Address:	1 Mi E of Peach Orchard Rd, Bastrop, LA 71220
Type of Facility:	Two-cell, aerated oxidation pond with tablet chlorination

DEQ Personnel:		
Casey Head	Manager	(318) 362-5448
U.S. EPA Personnel:		
Racquel Douglas	Region 6 Water Enforcement	(214) 665-6579
Robert Houston	Region 6 Water Enforcement	(214) 665-8565

Summary of Findings

Introduction

On June 12, 2012, an unannounced Compliance Evaluation Inspection (CEI) was conducted by the Environmental Protection Agency (EPA) at the Louisiana Land & Water Co Inc (LWC) – Woodland Acres Sewer #1 wastewater treatment facility (WWTF). The inspection CEI was to determine LPDES General Sanitary Class II permit compliance for LAG540758. This inspection was conducted in conjunction with several other evaluations of plants owned and operated by LWC. Initial contact was made at the LWC main office. EPA requested a company representative meet EPA at the WWTF. LWC did not send a company representative for the CEI.

The WWTF is located one mile east of Peach Orchard Road in Bastrop, Morehouse Parish, Louisiana. The WWTF is a two-cell oxidation pond with tablet chlorination. Flow discharges from the facility into an unnamed creek, thence into Cypress Bayou in subsegment 080401 of the Ouachita River Basin.

Areas of Concern

During the inspection, the Inspector noticed the following:

- The WWTF discharged at the time of inspection.
- Aerator was not working.
- Power was red tagged; no power.
- Failed to have chlorine in the contact chamber.
- Grass was cut.

On June 15, 2012, at 1:26 PM, EPA conducted an exit interview with Brandy Pruett. During the exit interview, credentials were presented and areas of concern were discussed. EPA also requested to review Discharge Monitoring Reports, Laboratory Records, Calibration Records, and Maintenance Records. Brandy Pruett provided Discharge Monitoring Reports and Laboratory Records, but failed to provide Calibration Records and Maintenance Records. Brandy Pruett also failed to provide current certification for LWC's Operators.

Photo Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 1 of 12

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston

Date: June 12, 2012

Time: 3:41 PM

Location: Woodland Acres Sewer #1

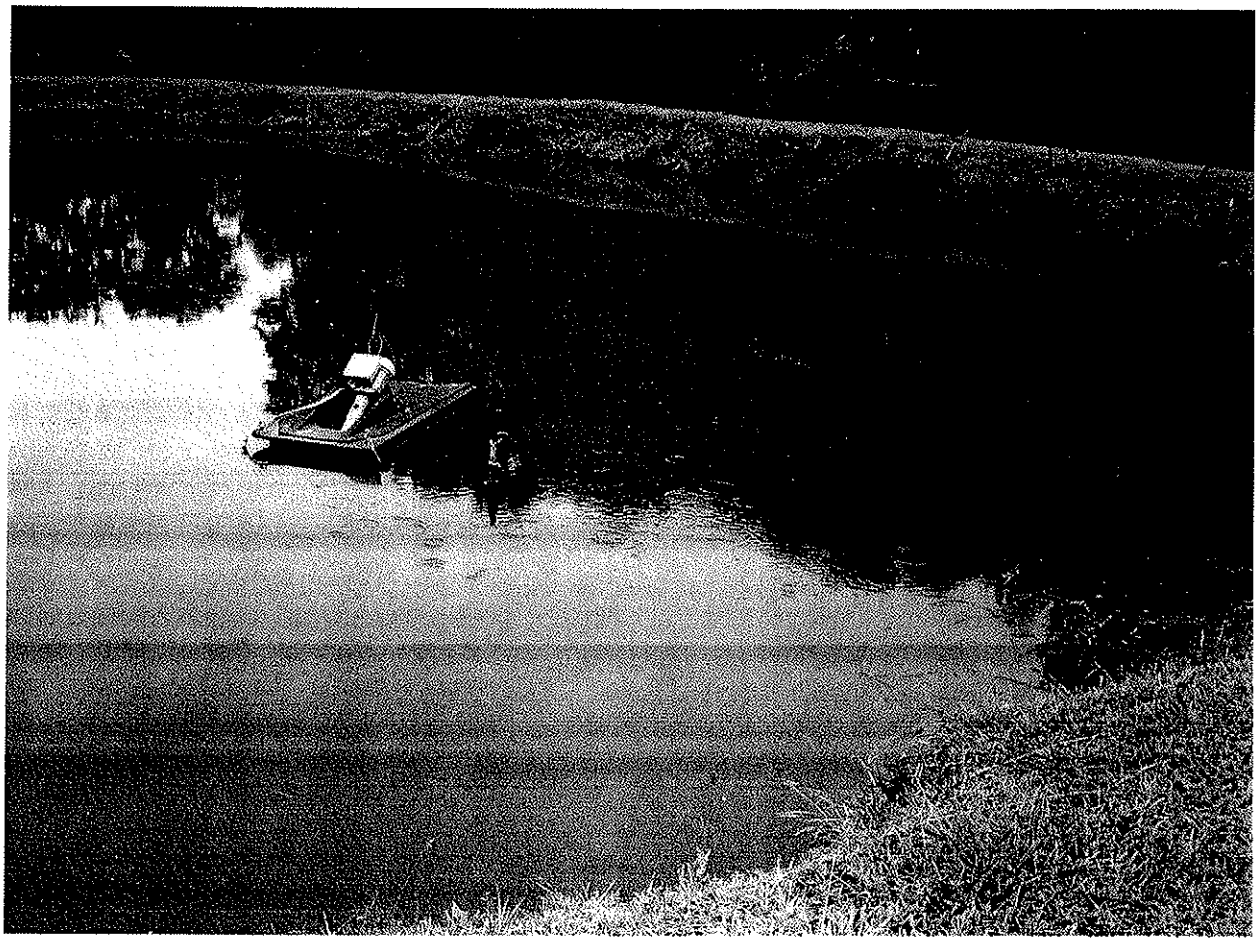
City/County: Bastrop

State: Louisiana

Weather: 81.0 °F

Conditions: Clear

Subject: Failed aerator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 2 of 12

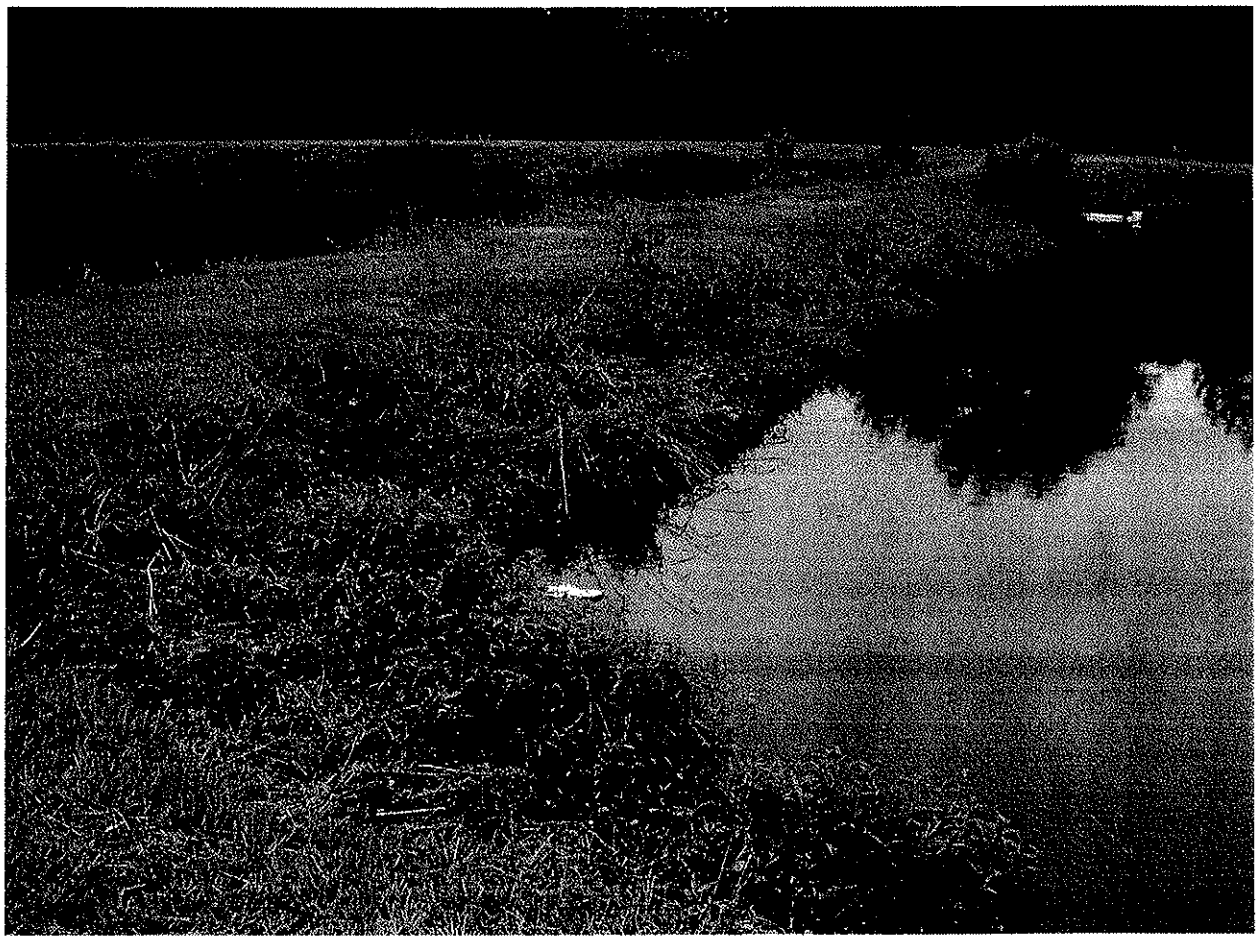
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 12, 2012 **Time:** 3:41 PM

Location: Woodland Acres Sewer #1 **City/County:** Bastrop **State:** Louisiana

Weather: 81.0 °F **Conditions:** Clear

Subject: Failed to remove overgrown vegetation from the pond banks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 3 of 12

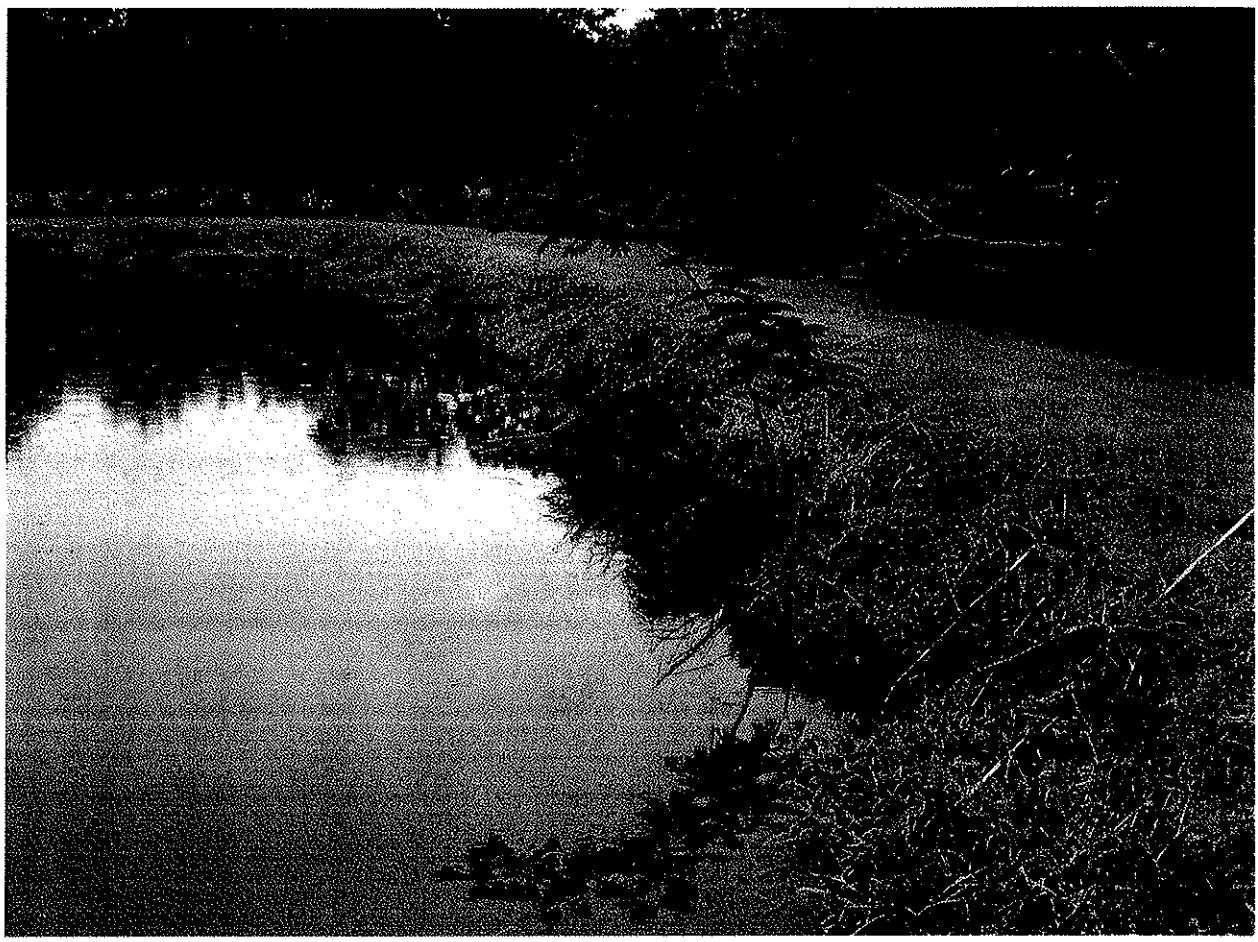
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 12, 2012 **Time:** 3:42 PM

Location: Woodland Acres Sewer #1 **City/County:** Bastrop **State:** Louisiana

Weather: 81.0 °F **Conditions:** Clear

Subject: Failed to remove overgrown vegetation from the pond banks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 4 of 12

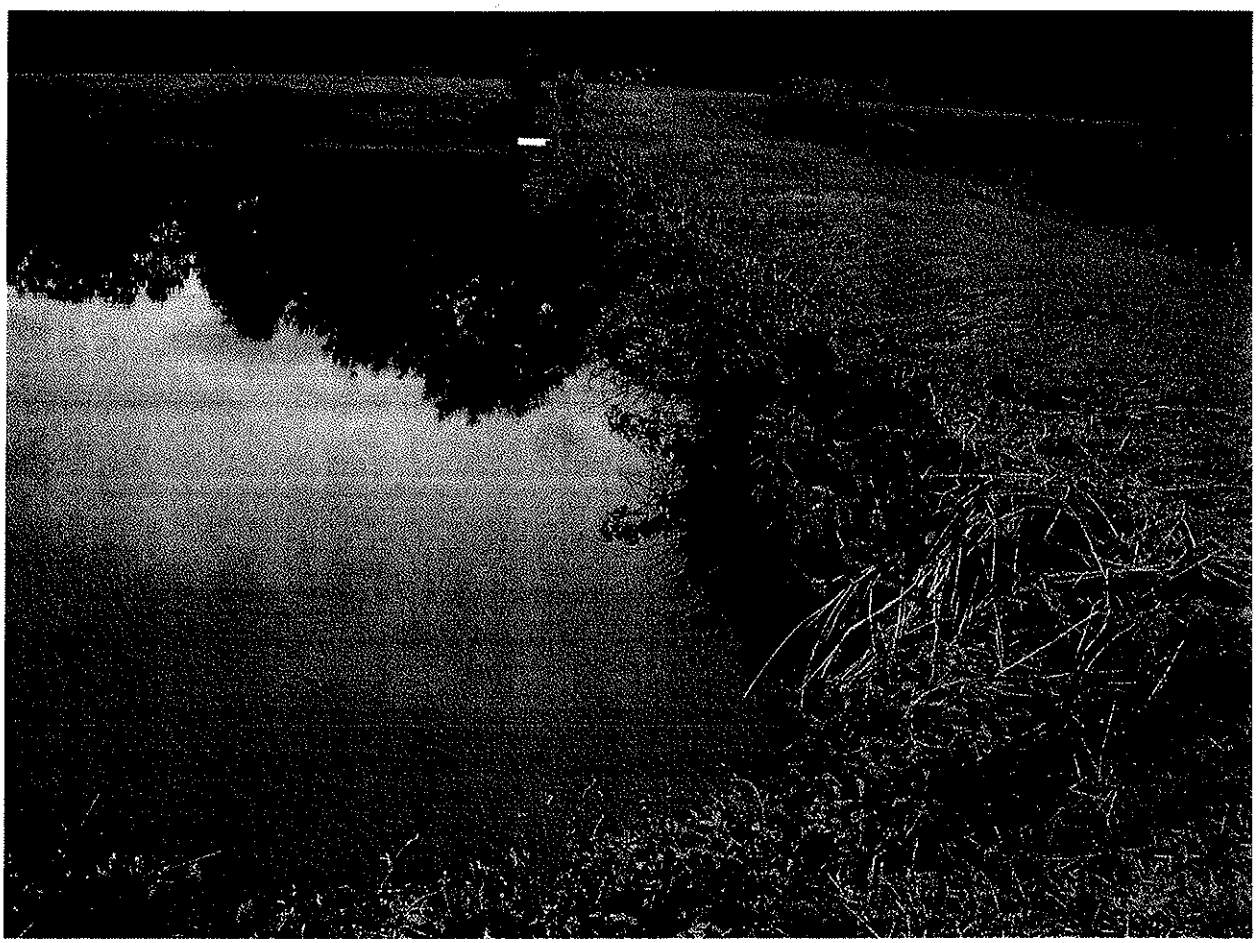
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 12, 2012 **Time:** 3:48 PM

Location: Woodland Acres Sewer #1 **City/County:** Bastrop **State:** Louisiana

Weather: 81.0 °F **Conditions:** Clear

Subject: Failed to remove overgrown vegetation from the pond banks



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 5 of 12

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 12, 2012 **Time:** 3:48 PM

Location: Woodland Acres Sewer #1 **City/County:** Bastrop **State:** Louisiana

Weather: 81.0 °F **Conditions:** Clear

Subject: Failed to remove overgrown vegetation from the pond banks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 6 of 12

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 12, 2012 **Time:** 3:49 PM

Location: Woodland Acres Sewer #1 **City/County:** Bastrop **State:** Louisiana

Weather: 81.0 °F **Conditions:** Clear

Subject: Failed to remove overgrown vegetation from the pond banks

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 1

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Overview of oxidation pond with vegetative growth. Note very large mature trees.

Time: 1:46pm (1)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 2

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

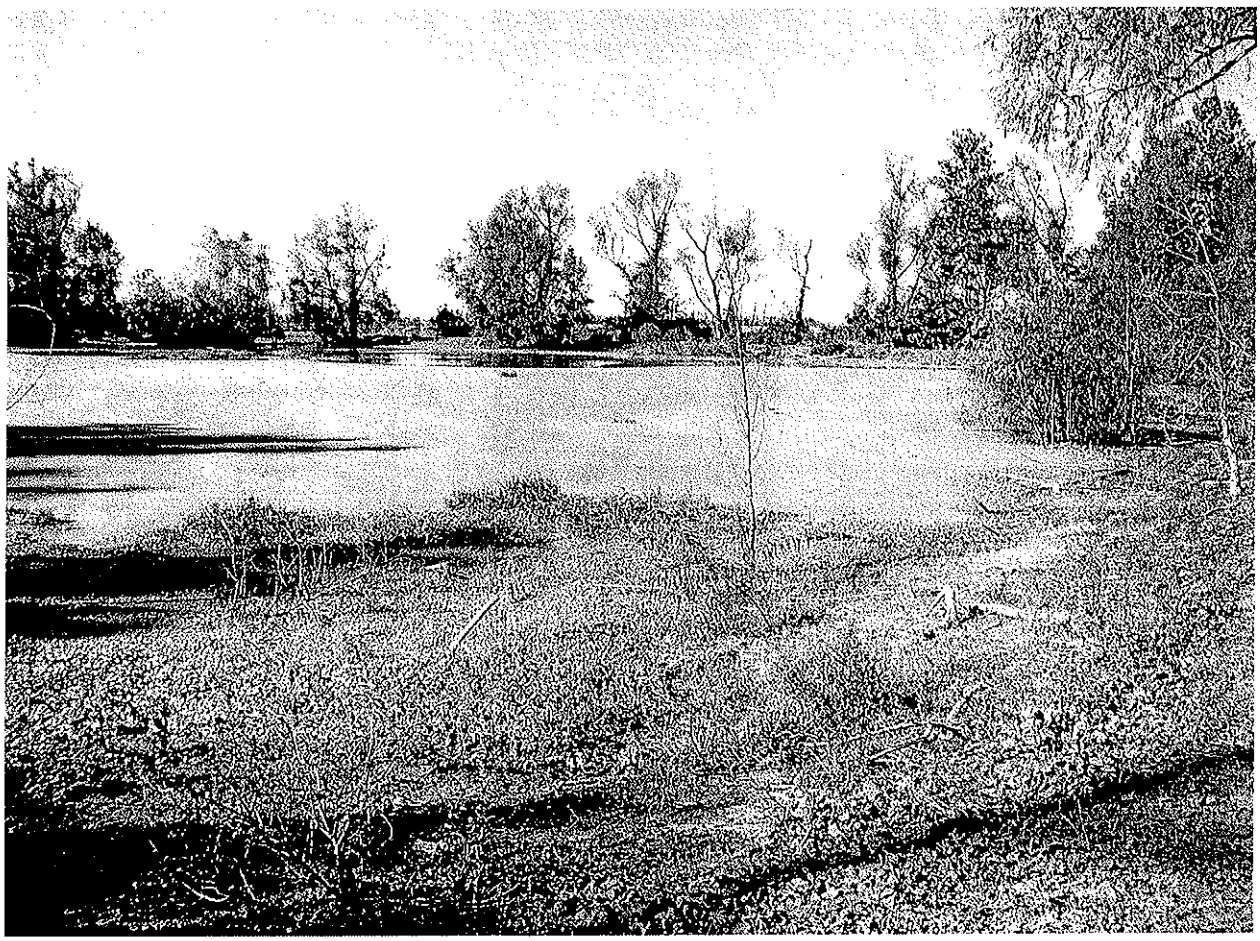
Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound. **State:** LA **Weather:** Clear

Subject: Panned shot of oxidation pond. Note large surface blanket of duck weed on pond surface.

Time: 1:46pm (2)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photo: 3
Official Photograph Log

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Trees growing inside of berm wall.

Time: 1:49pm (3)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photo: 4

Official Photograph Log

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

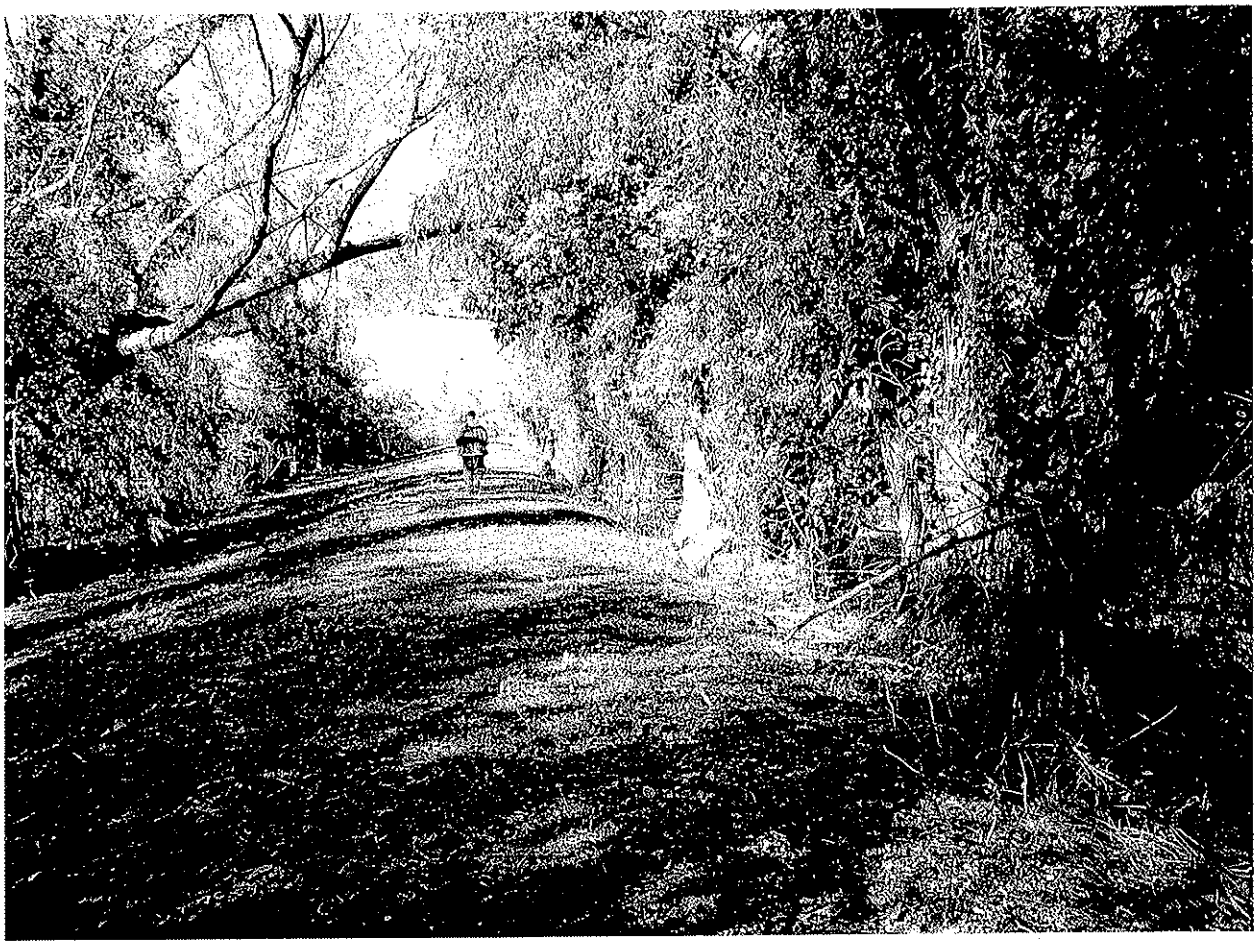
Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Treeline growing on inside berm wall.

Time: 1:50pm (4)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photo: 5
Official Photograph Log

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

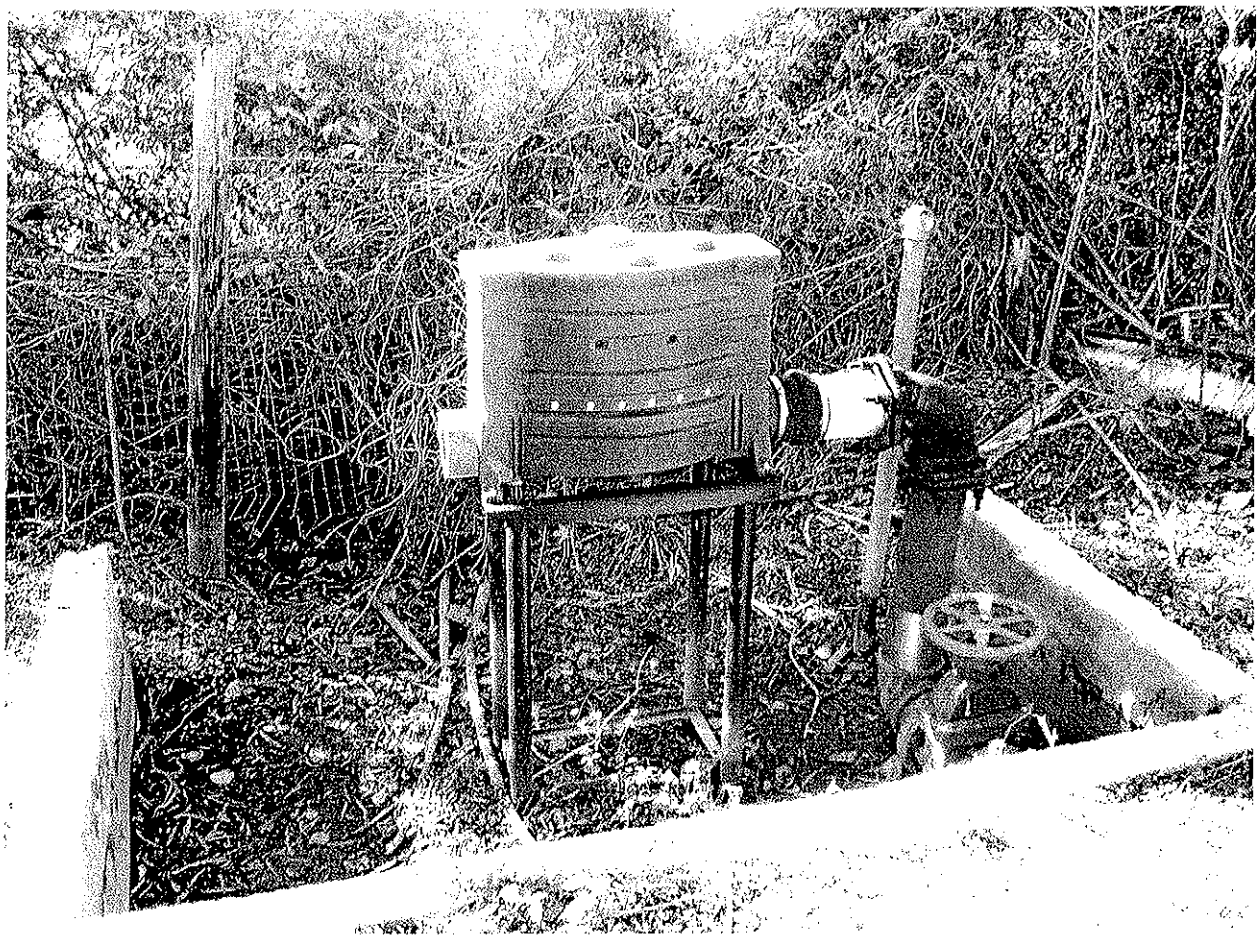
Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Stack-feed chlorinator on metal stand for treatment of effluent discharge from pond. Pond was not discharging at time of inspection. No concrete contact chamber follows the chlorinator as required to meet the minimum detention time for proper disinfection.

Time: 1:52pm (6)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 6

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

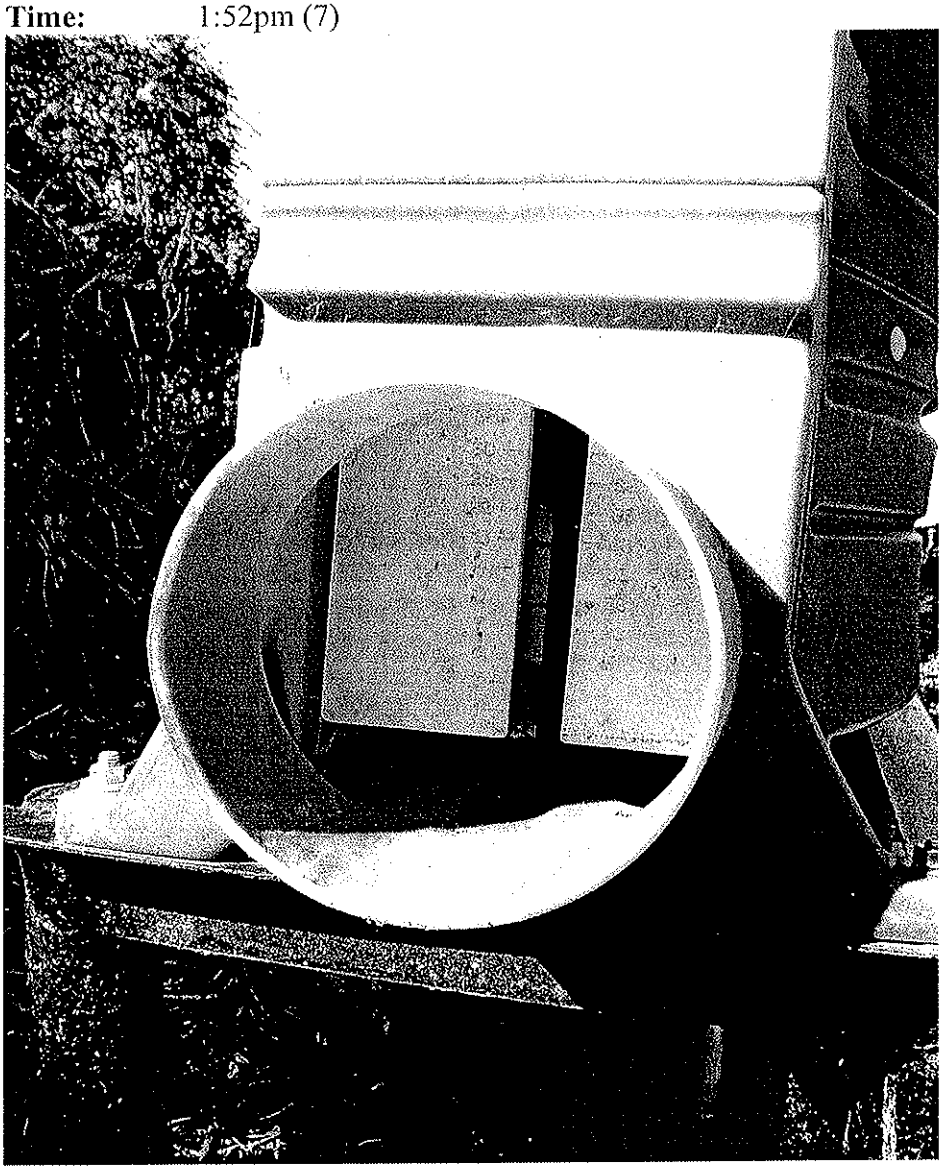
Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Discharge opening in stack-feed chlorinator. Chlorine tabs and evidence of a prior discharge are visible.

Time: 1:52pm (7)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 7

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: OTFL discharge location to ditch between pond and adjacent field.

Time: 1:54pm (9)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 8

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: More adult trees growing inside of oxidation ponds berm walls.

Time: 1:56pm (11)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 9

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Large copse of trees growing inside of oxidation pond's berm walls.

Time: 1:56pm (12)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photo: 10

All images were generated/saved using: Olympus D-590 ZOOM/xD Picture Card

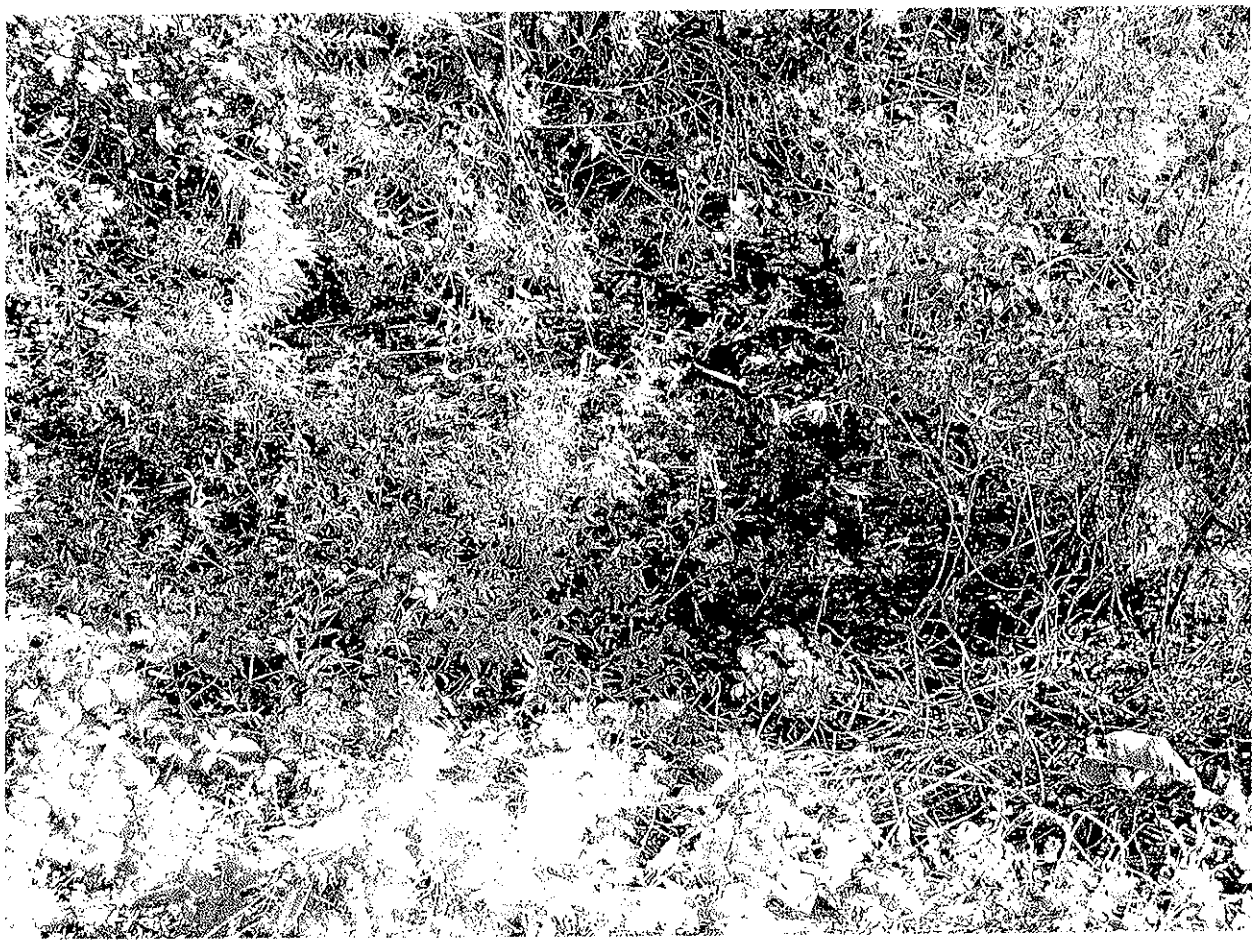
Photographer: Patricia Willis **Date:** 11-6-07

Location: Hunter Heights Oxidation Pond

City/County: Mound **State:** LA **Weather:** Clear

Subject: Drainage ditch holding water outside of fenced pond area. The ditch is situated between the adjacent field and the fence.

Time: 2:11pm (16)



Madelon Carter
<Madelon.Carter@LA.GOV>
11/09/2007 01:31 PM

To David Long/R6/USEPA/US@EPA, Patriciaa Willis/R6/USEPA/US@EPA
cc Kirk Cormier <Kirk.Cormier@LA.GOV>, Larry Baldwin <Larry.Baldwin@LA.GOV>, Celena Cage <Celena.Cage@LA.GOV>
bcc
Subject FW: Operator Certification for Jeff Pruett and Mike Risinger

History: This message has been replied to.

David / Patricia:
As requested info from LDHH.

Madelon

-----Original Message-----
From: Scott Green [mailto:rsgreen@dhh.la.gov]
Sent: Friday, November 09, 2007 11:25 AM
To: Madelon Carter
Cc: Buddy Smith; CLAY BOWERS
Subject: Operator Certification for Jeff Pruett and Mike Risinger

Madelon,

I spoke with Jill Ruffin in our Operator Certification office in Baton Rouge. She informed me that Mr. Jeff Pruett has no wastewater certification shown in the Op. Cert. database and Mr. Mike Risinger is not in the Op. Cert. database which would indicate that he has no certification in wastewater either.

Thank you,

Scott Green, RS
Sanitarian Program Coordinator
Department of Health & Hospitals
Office of Public Health
Northeast Regional Office
Engineering Services Section
1650 Desiard Street, 2nd Floor
Monroe, LA 71201
Phone:(318) 361-7212
Fax:(318) 362-3163

MAPQUEST

Hunter Dr & Edna Dr
Mound LA
71282 US

Notes:

Only text visible within note field will print.

http://www.epa.gov/nrmrl/pubs/625r00008/html/tfs4.htm
Last updated on Tuesday, February 27th, 2007.

National Risk Management Research Laboratory

EPA 625/R-00/008

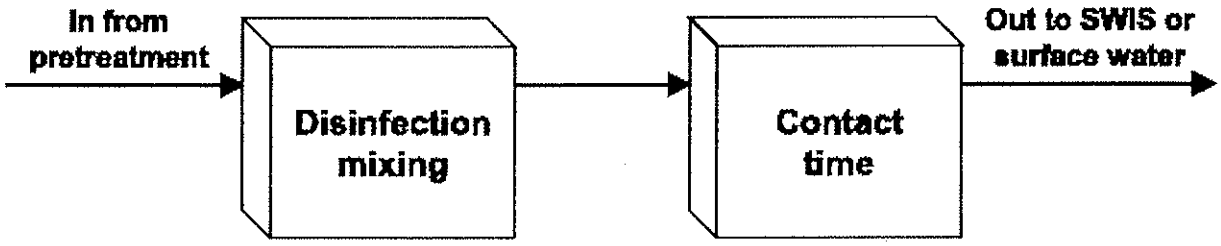
Onsite Wastewater Treatment Systems Technology Fact Sheet 4

Effluent Disinfection Processes

Description

The process of disinfection destroys pathogenic and other microorganisms in wastewater. A number of important waterborne pathogens are found in the United States, including some bacteria species, protozoan cysts, and viruses. All pretreatment processes used in onsite wastewater management remove some pathogens, but data are scant on the magnitude of this destruction. The two methods described in this section, chlorination and ultraviolet irradiation, are the most commonly used (figure 1). Currently, the effectiveness of disinfection is measured by the use of indicator bacteria, usually fecal coliform. These organisms are excreted by all warm-blooded animals, are present in wastewater in high numbers, tend to survive in the natural environment as long as or longer than many pathogenic bacteria, and are easy to detect and quantify.

Figure 1. Generic disinfection diagram



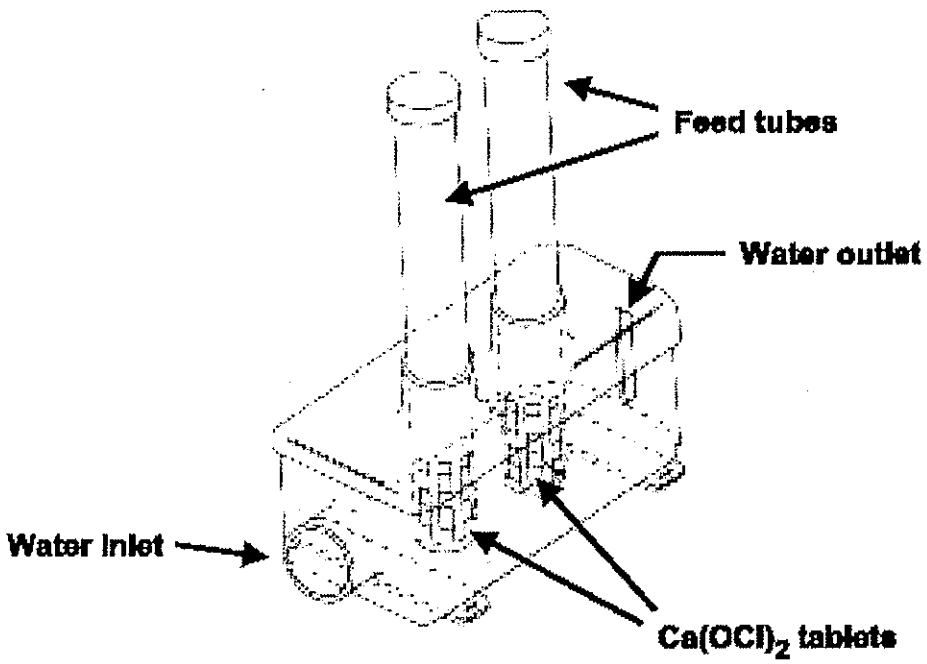
A number of methods can be used to disinfect wastewater. These include chemical agents, physical agents, and irradiation. For onsite applications, only a few of these methods have proven to be practical (i.e., simple, safe, reliable, and cost-effective). Although ozone and iodine can be and have been used for disinfection, they are less likely to be employed because of economic and engineering difficulties.

Chlorine

Chlorine is a powerful oxidizing agent and has been used as an effective disinfectant in water and wastewater treatment for a century. Chlorine may be added to water as a gas (Cl_2) or as a liquid or solid in the form of sodium or calcium hypochlorite, respectively. Because the gas can present a significant safety hazard and is highly corrosive, it is not recommended for onsite applications. Currently, the solid form (calcium hypochlorite) is most favored for onsite applications. When added to water, calcium hypochlorite forms hypochlorous acid (HOCl) and calcium hydroxide (hydrated lime, $Ca(OH)_2$). The resulting pH increase promotes the formation of the anion, OCl^-, which is a free form of chlorine. Because of its reactive nature, free chlorine will react with a number of reduced compounds in wastewater, including sulfide, ferrous iron, organic matter, and ammonia. These nonspecific side reactions result in the formation of combined chlorine (chloramines), chloro-organics, and chloride, the last two of which are not effective as disinfectants. Chloramines are weaker than free chlorine but are more stable. The difference between the chlorine residual in the wastewater after some time interval (free and combined chlorine) and the initial dose of chlorine is referred to as chlorine demand. The 15-minute chlorine demand of septic tank effluent may range from 30 to 45 mg/L as Cl; for biological treatment effluents, such as systems in Technology Fact Sheets 1, 2, and 3, it may range from 10 to 25 mg/L; and for sand filtered effluent, it may be 1 to 5 mg/L (Technology Fact Sheets 10 and 11).

Calcium hypochlorite is typically dosed to wastewater in an onsite treatment system using a simple tablet feeder device (figure 2). Wastewater passes through the feeder and then flows to a contact tank for the appropriate reaction. The product of the contact time and disinfectant residual concentration (Ct) is often used as a parameter for design of the system. The contact basin should be baffled to ensure that short-circuiting does not occur. Chlorine and combined chlorine residuals are highly toxic to living organisms in the receiving water. Because overdosing (ecological risk) and underdosing (human health risk) are quite common with the use of tablets, long swales/ditches are recommended prior to direct discharge to sensitive waters.

Figure 2. Example of a stack-feed chlorinator



Use of simple liquid sodium hypochlorite (bleach) feeders is more reliable but requires more frequent site visits by operators. These systems employ aspirator or suction feeders that can be part of the pressurization of the wastewater, causing both the pump and the feeder to require inspection and calibration. These operational needs should be met by centralized management or contracted professional management.

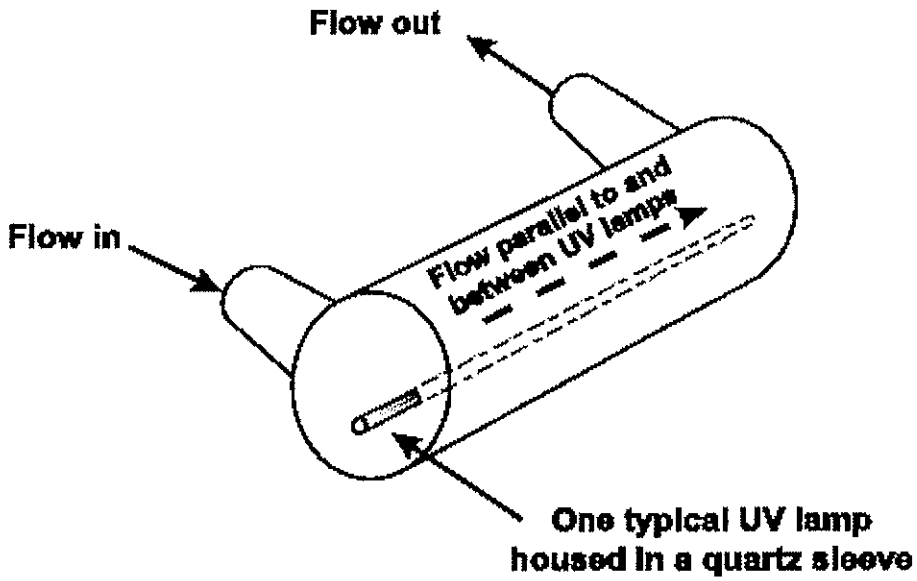
Ultraviolet irradiation

The germicidal properties of ultraviolet (UV) irradiation have been recognized for many years. UV is germicidal in the wavelength range of 250 to 270 nm. The radiation penetrates the cell wall of the organism and is absorbed by cellular materials, which either prevents replication or causes the death of the cell. Because the only UV radiation effective in destroying the organism is that which reaches it, the water must be relatively free of turbidity. Because the distance over which UV light is effective is very limited, the most effective disinfection occurs when a thin film of the water to be treated is exposed to the radiation. The quantity of UV irradiation required for a given application is measured as the radiation intensity in microWatt-seconds per square centimeter ($mW\text{-}s/cm^2$). For each application, wastewater transmittance, organisms present, bulb and sleeve condition, and a variety of other factors will have an impact on the $mW\text{-}s/cm^2$ required to attain a specific effluent microorganism count per 100 mL. The most useful variable that can be readily controlled and monitored is Total Suspended Solids. TSS has a direct impact on UV disinfection, which is related to the level of pretreatment provided.

Many commercial UV disinfection systems (figure 3) are available in the marketplace. Each has its own approach to how the wastewater contacts UV irradiation, such as the type of bulb (medium or low pressure; medium, low, or high intensity), the type of contact chamber configuration (horizontal or

vertical), or the sleeve material separating the bulb from the liquid (quartz or teflon). All can be effective, and the choice will usually be driven by economics.

Figure 3. Wastewater flow in a quartz UV unit



Typical applications

Disinfection is generally required in three onsite-system circumstances. The first is after any process that is to be surface discharged. The second is before a SWIS where there is inadequate soil (depth to ground water or structure too porous) to meet ground water quality standards. The third is prior to some other immediate reuse (onsite recycling) of effluent that stipulates some specific pathogen requirement (e.g., toilet flushing or vegetation watering).

Design assumptions

Chlorination units must ensure that sufficient chlorine release occurs (depending on pretreatment) from the tablet chlorinator. These units have a history of erratic dosage, so frequent attention is required. Performance is dependent on pretreatment, which the designer must consider. At the point of chlorine addition, mixing is highly desirable and a contact chamber is necessary to ensure maximum disinfection. Working with chlorinator suppliers, designers should try to ensure consistent dosage capability, maximize mixing usually by chamber or head loss, and provide some type of pipe of sufficient length to attain effective contact time before release. Tablets are usually suspended in open tubes that are housed in a plastic assembly designed to increase flow depth (and tablet exposure) in proportion to effluent flow. Without specific external mixing capability, the contact pipe (large-diameter Schedule 40 PVC) is the primary means of accomplishing disinfection. Contact time in these pipes (often with added baffles) is on the order of 4 to 10 hours, while dosage levels are in excess of those stated in table 1 for different pretreatment qualities and pH values. The commercial

chlorination unit is generally located in a concrete vault with access hatch to the surface. The contact pipe usually runs from the vault toward the next step in the process or discharge location. Surface discharges to open swales or ditches will also allow for dechlorination prior to release to a sensitive receiving water.

Table 1. Chlorine disinfection dose (in mg/L) design guidelines for onsite applications

Calcium hypochlorite	Septic tank effluent	Biological treatment effluent	Sand filter effluent
pH 6	35 - 50	15 - 30	2 - 10
pH 7	40 - 55	20 - 35	10 - 20
pH 8	50 - 65	30 - 45	20 - 35
Note: Contact time = 1 hour at average flow and temperature 20°C. Increase contact time to 2 hours at 10°C and 8 hours at 5°C for comparable efficiency. Dose = mg/L as Cl. Doses assume typical chlorine demand and are conservative estimates based on fecal coliform data.			

The effectiveness of UV disinfection is dependent upon UV power (table 2), contact time, liquid film thickness, wastewater absorbance, wastewater turbidity, system configuration, and temperature. Empirical relationships are used to relate UV power (intensity at the organism boundary) and contact time. Table 2 gives a general indication of the dose requirements for selected pathogens. Since effective disinfection is dependent on wastewater quality as measured by turbidity, it is important that pretreatment provide a high degree of suspended and colloidal solids removal.

Table 2. Typical ultraviolet (UV) system design parameters

Design parameter	Typical design value
UV dosage	20 - 140 mW/-s/cm^2
Contact time	6 - 40 seconds
UV intensity	3 - 12 mW/-s/cm^2
Wastewater UV transmittance	50 - 70%

Wastewater velocity	2 - 15 inches per second

Commercially available UV units that permit internal contact times of 30 seconds at peak design flows for the onsite system can be located in insulated outdoor structures or in heated spaces of the structure served, both of which must protect the unit from dust, excessive heat, freezing, and vandals. Ideally, the unit should also provide the necessary UV intensity (e.g., 35,000 to 70,000 mW-s/cm^2) for achieving fecal coliform concentrations of about 200 CFU/100 mL. The actual dosage that reaches the microbes will be reduced by the transmittance of the wastewater (e.g., continuous-flow suspended-growth aerobic systems [CFSGAS] or fixed-film systems [FFS] transmittance of 60 to 65 percent). Practically, septic tank effluents cannot be effectively disinfected by UV, whereas biological treatment effluents can meet a standard of 200 cfu/100 mL with UV. High-quality reuse standards will require more effective pretreatment to be met by UV disinfection. No additional contact time is required. Continuous UV bulb operation is recommended for maximum bulb service life. Frequent on/off sequences in response to flow variability will shorten bulb life. Other typical design parameters are presented in table 2.

Performance

There are few field studies of tablet chlorinators, but those that exist for post-sand-filter applications show fecal coliform reductions of 2 to 3 logs/100 mL. Another field study of tablet chlorinators following biological treatment units exceeded a standard of 200 FC/100 mL 93 percent of the time. No chlorine residual was present in 68 percent of the samples. Newer units managed by the biological unit manufacturer fared only slightly better. Problems were related to TSS accumulation in the chlorinator, tablet caking, failure of the tablet to drop into the sleeve, and failure to maintain the tablet supply. Sodium hypochlorite liquid feed systems can provide consistent disinfection of sand filter effluents (and biological system effluents) if the systems are managed by a utility.

Data for UV disinfection for onsite systems are also inadequate to perform a proper analysis. However, typical units treating sand filter effluents have provided more than 3 logs of FC removal and more than 4 logs of poliovirus removal. Since this level of pretreatment results in a very low final FC concentration (<100 CFU/100 mL), removals depend more on the influent concentration than inherent removal capability. This is consistent with several large-scale water reuse studies that show that filtered effluent can reach essentially FC-free levels (<1 CFU/100 mL) with UV dosage of about 100 mW-s/cm^2, while higher (but attainable) effluent FC levels require less dosage to filtered effluent (about 48 mW-s/cm^2) than is required by aerobic unit effluent (about 60 mW-s/cm^2). This can be attributed to TSS, turbidity, and transmittance (table 3). Average quartz tube transmittance is about 75 to 80 percent.

Table 3. Typical (UV) transmittance values for water

Wastewater treatment level	Percent transmittance
Primary	45 - 67
Secondary	60 - 74
Tertiary	67 - 82
Source: USEPA, 1986.	

Management needs

Chlorine addition by tablet feeders is likely to be the most practical method for chlorine addition for onsite applications. Tablet feeders are constructed of durable, corrosion-free plastics and are designed for in-line installation. Tablet chlorinators come as a unit similar to figure 2. If liquid bleach chlorinators are used, they would be similarly constructed. That unit is placed inside a vault that exits to the contact basin. The contact basin may be plastic, fiberglass, or a length of concrete pipe placed vertically and outfitted with a concrete base. Baffles should be provided to prevent short-circuiting of the flow. The contact basin should be covered to protect against the elements, but it should be readily accessible for maintenance and inspection.

The disinfection system should be designed to minimize operation and maintenance requirements, yet ensure reliable treatment. For chlorination systems, routine operation and maintenance would include servicing the tablet or solution feeder equipment, adding tablets or premixed solution, adjusting flow rates, cleaning the contact tank, and collecting and analyzing effluent samples for chlorine residuals. Caking of tablet feeders may occur and will require appropriate maintenance. Bleach feeders must be periodically refilled and checked for performance. Semiskilled technical support should be sufficient, and estimates of time are about 6 to 10 hours per year. There are no power requirements for gravity-fed systems. Chemical requirements are estimated to be about 5 to 15 pounds of available chlorine per year for a family of four. During the four or more inspections required per year, the contact basin may need cleaning if no filter is located ahead of the unit. Energy requirements for a gravity-fed system are nil. If positively fed by aspirator/suction with pumping, the disinfection unit and alarms for pump malfunctions will use energy and require inspection. Essentially unskilled (but trained) labor may be employed. Safety issues are minimal and include wearing of proper gloves and clothing during inspection and tablet/feeder work.

Commercially available package UV units are available for onsite applications. Most are self-contained and provide low-pressure mercury arc lamps encased by quartz glass tubes. The unit should be installed downstream of the final treatment process and protected from the elements. UV units must be located near a power source and should be readily accessible for maintenance and inspection. Appropriate controls for the unit must be corrosion-resistant and enclosed in accordance with electrical codes.

Routine operation and maintenance for UV systems involves semiskilled

technician support. Tasks include cleaning and replacing the UV lamps and sleeves, checking and maintaining mechanical equipment and controls, and monitoring the UV intensity. Monitoring would require routine indicator organism analysis. Lamp replacement (usually annually) will depend upon the equipment selected, but lamp life may range from 7,500 to 13,000 hours. Based on limited operational experience, it is estimated that 10 to 12 hours per year would be required for routine operation and maintenance. Power requirements may be approximately 1 to 1.5 kWh/d. Quartz sleeves will require alcohol or other mildly acidic solution at each (usually four per year) inspection.

Whenever disinfection is required, careful attention to system operation and maintenance is necessary. Long-term management, through homeowner-service contracts or local management programs, is an important component of the operation and maintenance program. Homeowners do not possess the skills needed to perform proper servicing of these units, and homeowner neglect, ignorance, or interference may contribute to malfunctions.

Risk management issues

With proper management, the disinfection processes cited above are reliable and should pose little risk to the homeowner. As mentioned above, a potentially toxic chlorine residual may have an important environmental impact if it persists at high concentrations in surface waters. By-products of chlorine reactions with wastewater constituents may also be toxic to aquatic species. If dechlorination is required prior to surface discharge, reactors containing sulfur dioxide, sodium bisulfate, sodium metabisulfate, or activated carbon can be employed. If the disinfection processes described above are improperly managed, the processes may not deliver the level of pathogen destruction that is anticipated and may result in some risk to downstream users of the receiving waters. The systems described are compact and require modest attention. Chlorination does not inherently require energy input; UV irradiation and dosage pumps do consume some energy (>1kWh/day). Both processes will require skilled technical support for the monitoring of indicator organisms in the process effluents.

Chlorination systems respond to flow variability if the tablets are feeding correctly. UV does not do so and is designed for the highest flow scenario, thus overdosing at lower flows since there is no danger in doing so. Toxic loads are unlikely to affect either system, but TSS can affect both. Inspections must include all pretreatment steps. UV is more sensitive to extreme temperatures than chlorination, and must be housed appropriate to the climate. In extremely cold climates, the UV system can be housed inside the home with minimal danger to the inhabitants. Power outages will terminate UV disinfection and pressurized pumps for both systems, while causing few problems for gravity-fed chlorination units. There should be no odor problems during these outages.

Costs

Installed costs of a complete tablet chlorination unit are about $400 to $500 for the commercial chlorinator unit and associated materials and $800 to $1,200 for installation and housing. Operation and maintenance would consist

of tablets ($30 to $50 per year), labor ($75 to $100 per year), and miscellaneous repairs and replacements ($15 to $25 per year), in addition to any analytical support required.

Installed costs of UV units and associated facilities are $1,000 to $2,000. O/M costs include power ($35 to $40 per year), semiskilled labor ($50 to $100 per year), and lamp replacement ($70 to $80 per year), plus any analytical support.

References

Bauer, D.H., E.T. Conrad, and D.G. Sherman. 1981. *Evaluation of Onsite Wastewater Treatment and Disposal Options*. EPA 600/S2-81-178. NTIS No. PB-82-101-635. National Technical Information Service, Cincinnati, OH.

Crites, R., and G. Tchobanoglous. 1998. *Small and Decentralized Wastewater Management Systems*. WCB/McGraw-Hill, San Francisco, CA.

Hanzon, B.D., and R. Vigilia. 1999. Just the facts. *Water Environment and Technology* November 1999, 34-42.

Scheible, O.K. 1987. Development of a rationally based design protocol for the ultraviolet light disinfection process. *Journal of the Water Pollution Control Federation* 59:25.

University of Wisconsin. 1978. *Management of Small Waste Flows*. EPA 600/2-78-173. Cincinnati, OH.

U.S. Environmental Protection Agency (USEPA). 1980. *Design Manual: Onsite Wastewater Treatment and Disposal Systems*. EPA 625/1-80-0012. U.S. Environmental Protection Agency, Cincinnati, OH.

U.S. Environmental Protection Agency (USEPA). 1986. *Municipal Wastewater Disinfection Design Manual*. EPA 625/1-86-021. U.S. Environmental Protection Agency, Cincinnati, OH.

U.S. Environmental Protection Agency (USEPA). 1992.*Ultraviolet Disinfection Technology Assessment*. EPA-832/R-92-004. U.S. Environmental Protection Agency, Office of Water, Washington, DC.

Water Environment Federation. 1998. *Design of Municipal Wastewater Treatment Plants*, 3d ed. Alexandria, VA.

White, G.C. 1992. *The Handbook of Chlorination and Alternative Disinfectants*. 3d ed. Van Nostrand Reinhold, New York.

(2) STATE

DATE: September 30, 2008

TO: Racquel Douglas, USEPA Region 6

FROM: Mark Briggs, Eastern Research Group

SUBJECT: **Compliance Monitoring Report**

A Compliance Evaluation Inspection was conducted on **6 Aug 08** at the following location:

FACILITY NAME: **LWC Management, Inc. (Mt. Carmel – Maplewood Subdivision)**

ADDRESS: **Maplewood Drive**

CITY: **Bastrop, LA 71220**

INSPECTORS: **Mark Briggs – Eastern Research Group**

TYPE FACILITY: FEDERAL ( ) MUNICIPAL (X) NON-MUNICIPAL ( )

Compliance monitoring reports attached: (Check appropriate box)

NPDES#: LAG560081

( )MAJOR	( )NOD	( )CSI	( )PAI	( )BIO
(X)MINOR	(X)CEI	( )CSI-TOXICS	( )STORM WATER	

COMMENTS:

(2) State

United States Environmental Protection Agency
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3	L A G 5 6 0 0 8 1 11 12	0 8 0 8 0 6 17 18	C 19	B 20	1

21 S I C C O D E : 4 9 5 2 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 0 . 5 69 70	1 71	N 72	N 73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Louisiana Land and Water Company **Maplewood-Mt. Carmel Sewer District** **Maplewood Drive** **Bastrop, LA 71220**	**12:30 pm/August 6, 2008**	**Dec. 11, 2006**
	Exit Time/Date **12:50 pm/August 6, 2008**	Permit Expiration Date **Dec. 11, 2011**

Name(s) of On-Site Representatives	Title(s)	Phone Number
Jeff Pruett	**Owner**	**318-397-2835**

Name, Address of Responsible Official	Title	
Jeff Pruett **Louisiana Land and Water Company** **2800 North 7th Street** **West Monroe, LA 71291**	**Owner**	
	Phone Number **318-397-2835**	Contacted: YES **X** NO

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	N	Storm Water	S	CSO/SSO/Sewer Overflow
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	S	Operations & Maintenance		Other

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report for summary of findings during the inspection

Attachments: Photolog, Facility Documentation

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Mark Briggs	Eastern Research Group/ Chantilly, VA/ (703) 633-1600	9/30/08
Signature of Reviewer	Agency/Office	Date
	US EPA/6EN-WM/(214) 665- 6579	10/7/08

RECEIVED
OCT 02 2008
6EN-W

Introduction

On August 6, 2008, an unannounced Compliance Evaluation Inspection was conducted by U.S. EPA at the Louisiana Land & Water Company, Inc. (LWC) Mt. Carmel - Maplewood Subdivision Sewage Treatment facility located in Bastrop, LA. This inspection was conducted in conjunction with several other evaluations of plants own and operated by LWC Inc. Mr. J. Jeffery Pruett, President of LWC accompanied the inspection team during evaluation of this facility, plus the remaining evaluations at plants owned and operated by LWC.

The Mt. Carmel – Maplewood Subdivision Sewage Treatment facility is a single cell oxidation pond with two aerators and final chlorine disinfection using a chlorine contact chamber. This system has been issued a General Sanitary Class III Permit (LAG560081) from the LDEQ dated December 11, 2006. The permit allows LWC to discharge treated wastewater totaling less than 50,000 gallons per day. No design or construction documentation was provided for the site.

Inspection of the one-cell aeration pond indicates the pond system is in good working order. There was flow at the time of the inspection and chlorine tablets were present in the contact chamber. The pond had two aerators, both of which were operating at the time of inspection. According to Mr. Pruett, the aeration pond provides wastewater treatment for approximately 60 homes.

Areas of Concern

- A review of the monthly DMR data for January through June, 2008 indicated the TSS concentration exceeded the permit limit in May 2008. The DMR data shows the measured TSS concentration was 48 mg/L in the pond effluent. The permit limit for TSS from the Maplewood-Mt. Carmel treatment system is 20 mg/L (average) and 30 mg/L (maximum).

  A review of the LDEQ files for the Mt. Carmel – Maplewood Subdivision Sewage Treatment facility shows that a Notice of Potential Penalty letter dated March 21, 2007 was sent to LWC for permit violations. The letter shows 26 reported DMRs between April 1998 and April 2002 exceeded permit limits for TSS and BOD_5 for the Mt. Carmel – Maplewood Subdivision Sewage Treatment facility.

- When asked for operational logs at another treatment plant owned and operated by LWC, Mr. Pruett stated they do not maintain operational logs for the any of his plants and stated that it was more important to be serving his customers than developing paper. Section C.1(b) of the Standard Conditions of LPDES Permits states that the permittee shall allow the state administrative authority to have access to any records the representatives determine are necessary for enforcement of the permit. Section C.3 states the permittee shall maintain records for all monitoring information, including all calibration and maintenance records. Section C.3 also states the permittee shall maintain records for sewage sludge use and disposal for 5 years. Not maintaining operational logs for the treatment system, which are used to verify effluent quality is being maintained between periods when effluent monitoring is not occurring, violates Section C.1(b) and Section C.3.

NPDES Inspection Report Information

Company Name: Louisiana Land & Water Company, INC.

NPDES Permit Number: LAG560081

Mailing Address: 2800 North 7th Street, West Monroe, LA 71291

Type of Facility: One-Cell Aerated Pond

Responsible Officials:

J. Jeffery Pruett	President	800-346-7123

State Personnel:

Stuart Smith	LDEQ	318-362-5439

U.S. EPA Personnel:

Racquel Douglas	Region 6 Water Enforcement	214-665-6579

U.S. EPA Contractor Personnel:

Mark Briggs	Eastern Research Group	703-633-1600

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photographer: Mark Briggs

Date: 08/06/08

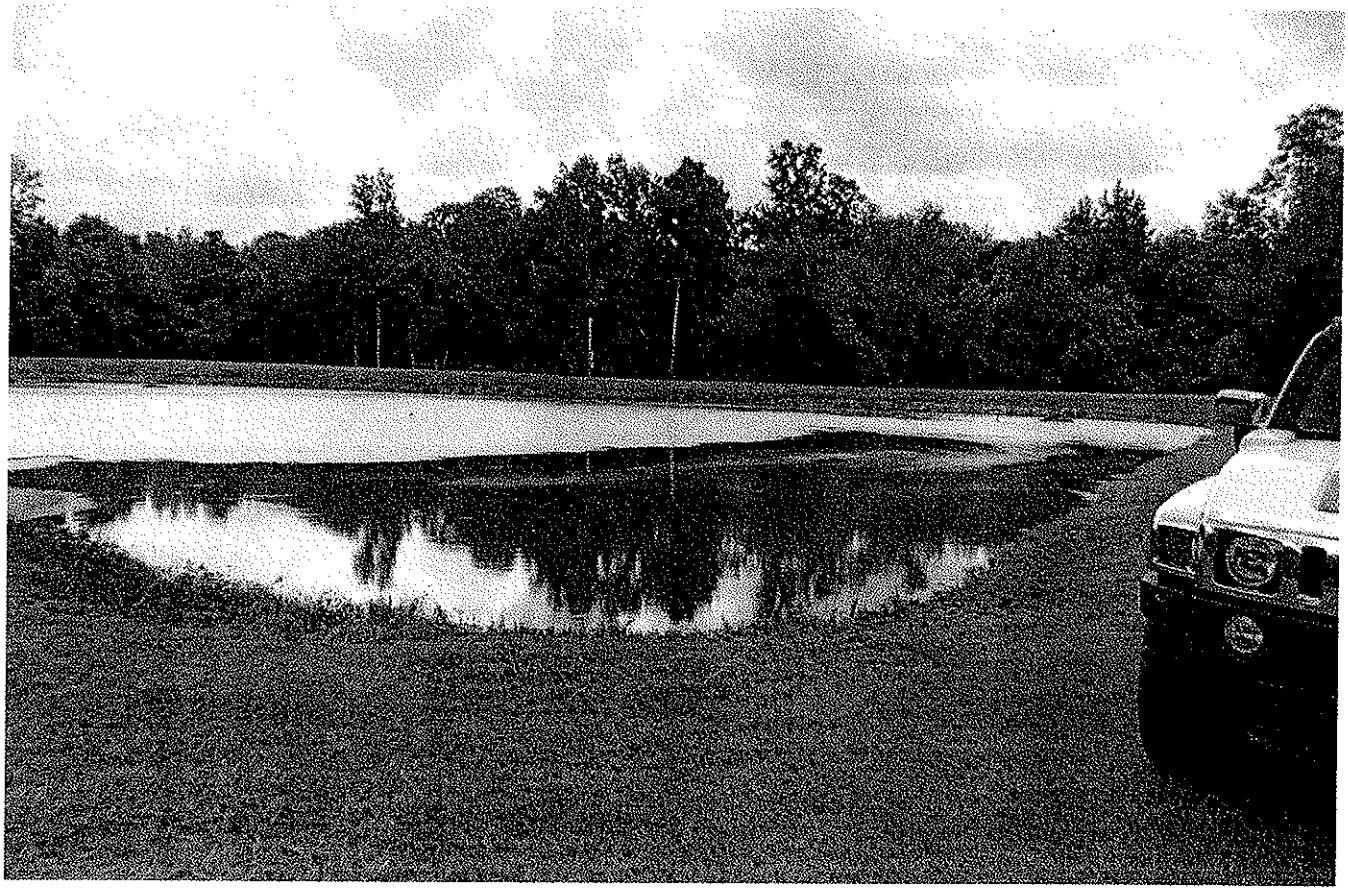
Location: Mt. Carmel – Maplewood Subdivision

City/County: Bastrop

State: LA

Weather: Clear

Subject: One cell pond with aerators operating



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Official Photograph Log

Photographer: Mark Briggs

Date: 08/06/08

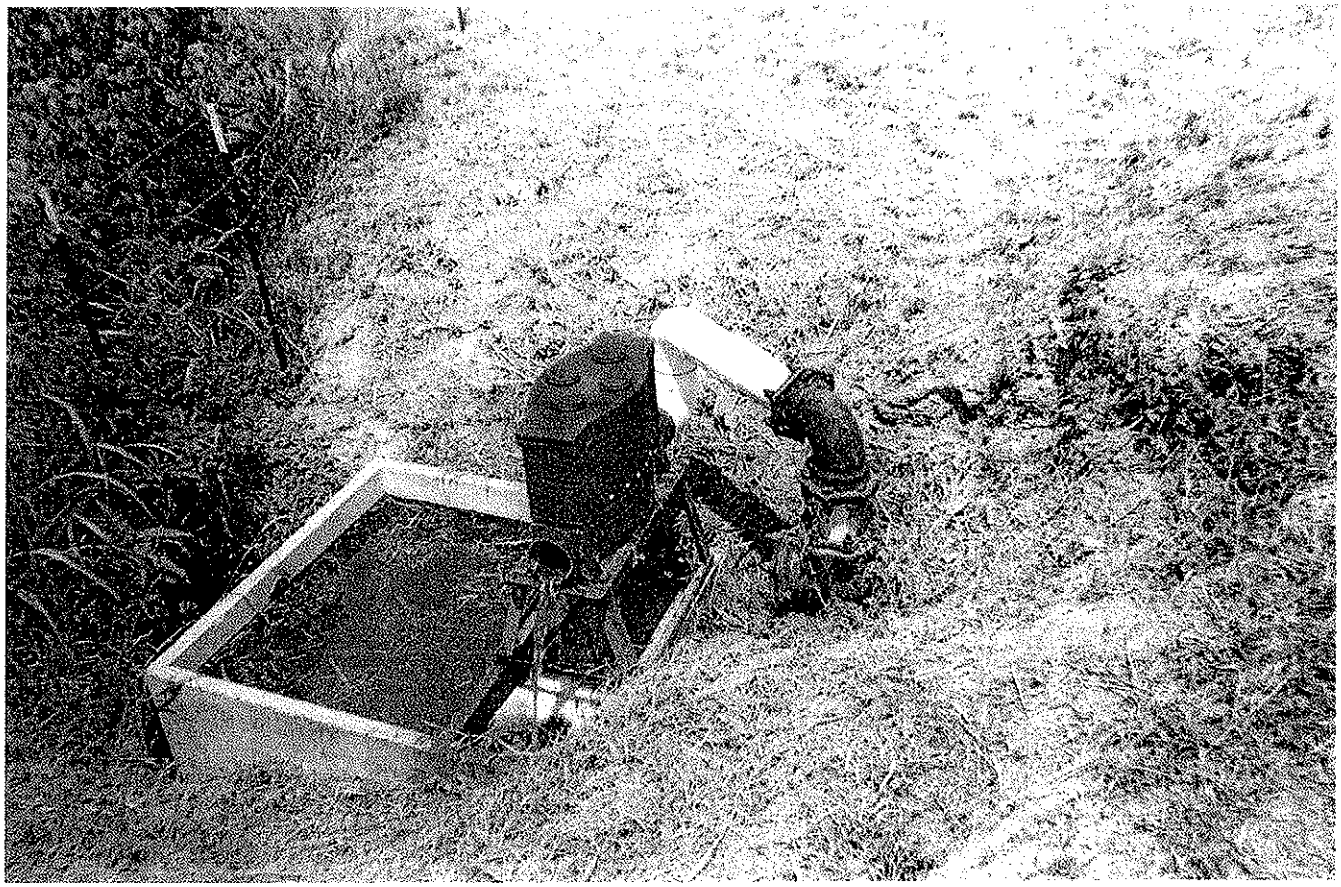
Location: Mt. Carmel – Maplewood Subdivision

City/County: Bastrop

State: LA

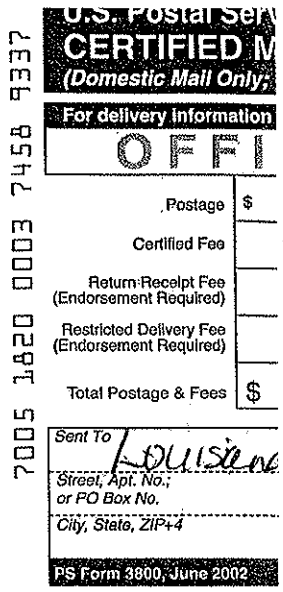
Weather: Clear

Subject: Chlorine contact chamber and final effluent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

NOV 1 9 2012



CERTIFIED MAIL-RETURN RECEIPT REQUESTED: 7005 1820 0003 7458 9337

J. Jeffery Pruett, President & CEO
Louisiana Land & Water Company, Inc.
2800 N. 7th St
West Monroe, LA 71291

Re: EPA Inspection Reports

Dear Mr. Pruett:

Enclosed is a CD containing copies of the inspection reports for inspections conducted at your facilities on June 11, 2012 through June 15, 2012. The inspections were conducted under the authority of the Clean Water Act. EPA conducted inspections at facilities identified by the following permit numbers: LAG540332, LAG540333, LAG540751, LAG540757, LAG541478, LAG541479, LAG541511, LAG540021, LAG540750, LAG540756, LAG540758, LAG541508, LAG560081, LA0104248, LA0110752, LAG541153, LAG541480, LAG560236, LAG560248, LAG570379, LAG570387, LA0104264, LA0108081, LAG530581, LAG540752, LAG560034, LAG570069, LAG570081, and LAG570070.

During the inspections, areas of concern were observed. Be advised that EPA may communicate with you about the resolution of these concerns at a later date. Copies of these inspection reports are also being mailed to the Louisiana Department of Environmental Quality.

If you have any questions concerning these inspection reports, please contact the inspector listed in the report. If you have any additional questions, please contact Mr. Robert Houston of my staff at (214) 665-8565.

Sincerely,

Jerry Saunders
Associate Director for Water Enforcement
Compliance Assurance and Enforcement Division
Water Enforcement Branch
U.S. EPA, Region 6

Enclosure

cc: Ms. Celena Cage, Administrator
Enforcement Division
Louisiana Department of Environmental Quality
P.O .Box 4312
Baton Rouge, LA 70821

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

DATE: **August 6, 2012**

SUBJECT: **Transmittal Memo – Compliance Monitoring Report**

FROM: Carol Peters, Chief
NPDES Industrial & Municipal Section (6EN-WM)

TO: Paulette Johnsey, Chief
NPDES Compliance Monitoring Section (6EN-WC)

A Compliance Evaluation Inspection was conducted on June 11, 2012 at the following location:

FACILITY NAME: **Louisiana Land & Water Co Inc – Bayou Galion Subdivision STP**

ADDRESS: **end of Martin Luther King Dr**

CITY: **Mer Rouge, LA 71261**

INSPECTOR: **Robert Houston**

TYPE FACILITY: FEDERAL( ) MUNICIPAL(X) NON-MUNICIPAL( )

Compliance monitoring reports attached: (Check appropriate box)

NPDES #: LAG541511

( )MAJOR ( )NOD ( )CSI ( )PAI ( )BIO
(X)MINOR (X)CEI ( )CSI-TOXICS ( )STORMWATER

COMMENTS:

08/27/12

United States Environmental Protectio[r] [e]ncy
Washington D.C. 20460

EPA NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N 2 5 3	L A G 5 4 1 5 1 1	1 2 0 6 1 1 17	18 C	19 R	20 1

21 S I C 4 9 5 2 66

Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved
67 69	70 1	71 N	72 N	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected	Entry Time/Date	Permit Effective Date
Louisiana Land & Water Co Inc **Bayou Galion Subdivision STP** **end of Martin Luther King Dr** **Mer Rouge, LA 71261**	**5:17 PM/ June 11, 2012**	**July 1, 2008**
	Exit Time/Date **5:33 PM/ June 11, 2012**	Permit Expiration Date **June 30, 2013**

Name(s) of On-Site Representatives	Title(s)	Phone Number(s)
David Shelborne, LWC	**Laborer**	**(318) 805-8714**
Brad Osborn, DEQ	**Staff**	**(318) 362-5439**
John Posey, DEQ	**Staff Scientist DCLA**	**(318) 362-5438**
Racquel Douglas, EPA	**Environmental Engineer**	**(214) 665-6579**
Robert Houston, EPA	**Environmental Engineer**	**(214) 665-8565**

Name, Address of Responsible Official	Title	
Brandy Pruett **Louisiana Land & Water Co Inc** **2800 North 7th Street** **West Monroe, LA 71291**	**Business Manager**	
	Phone Number **(318) 397-2835**	Contacted: YES √ NO

Section C: Areas Evaluated During Inspection
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Storm Water	N	CSO/SSO (Sewer Overflow)
U	Records/Reports	U	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
U	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	N	Laboratory	U	Operations & Maintenance		Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

See attached report for summary of findings during the inspection.

Attachment: Photograph Log

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone	Date
Robert Houston Robert Houston	**USEPA / 6EN-WM / 214-665-8565**	**August 2, 2012**
Signature of Reviewer **Racquel Douglas** Racquel Douglas	Agency/Office **USEPA / 6EN-WM / 214-665-6579**	Date **August 2, 2012**

NPDES Inspection Report Information

Company Name:	Louisiana Land & Water Co Inc
Facility Name:	Bayou Galion Subdivision STP
LPDES Permit Number:	LAG541511
AI Number:	43674
Mailing Address:	2800 North 7th Street, West Monroe, LA 71291
Facility Address:	end of Martin Luther King Dr, Mer Rouge, LA 71261
Type of Facility:	Three-cell, aerated oxidation pond with tablet chlorination

Louisiana Land & Water Co Inc Personnel:

David Shelborne	Laborer	(318) 805-8714

DEQ Personnel:

Brad Osborn	Staff	(318) 362-5439
John Posey	Staff Scientist DCLA	(318) 362-5438

U.S. EPA Personnel:

Racquel Douglas	Region 6 Water Enforcement	(214) 665-6579
Robert Houston	Region 6 Water Enforcement	(214) 665-8565

Summary of Findings

Introduction

On June 11, 2012, an unannounced Compliance Evaluation Inspection (CEI) was conducted by the Environmental Protection Agency (EPA) at the Louisiana Land & Water Co Inc (LWC) – Bayou Galion Subdivision STP wastewater treatment facility (WWTF). The inspection CEI was to determine LPDES General Sanitary Class II permit compliance for LAG541511. This inspection was conducted in conjunction with several other evaluations of plants owned and operated by LWC. Initial contact was made at the LWC main office. EPA requested a company representative meet EPA at the WWTF. David Shelborne, a company representative, was sent to assist with the CEI.

The WWTF is located at the end of Martin Luther King Drive in Mer Rouge, Morehouse Parish, Louisiana. The WWTF is a three-cell, aerated oxidation pond with tablet chlorination and serves an estimated population of 78 people. Flow discharges from a pipe into Little Bayou Galion, thence into Bayou Lafourche in segment 080904 of the Ouachita River Basin.

Areas of Concern

During the inspection, the Inspector noticed the following:

- The WWTF did not discharge at the time of inspection.
- Failed to prevent overgrown vegetation at the storage area.
- Failed to prevent overgrown vegetation at the banks of the pond; difficult maneuver to the discharge location to collect samples.

On June 15, 2012, at 1:26 PM, EPA conducted an exit interview with Brandy Pruett. During the exit interview, credentials were presented and areas of concern were discussed. EPA also requested to review Discharge Monitoring Reports, Laboratory Records, Calibration Records, and Maintenance Records. LWC provided Discharge Monitoring Reports and Laboratory Records, but failed to provide Calibration Records and Maintenance Records. LWC also failed to provide current certification for LWC's Operators.

Photo Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 1 of 7

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:17 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Overgrown storage area

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 2 of 7

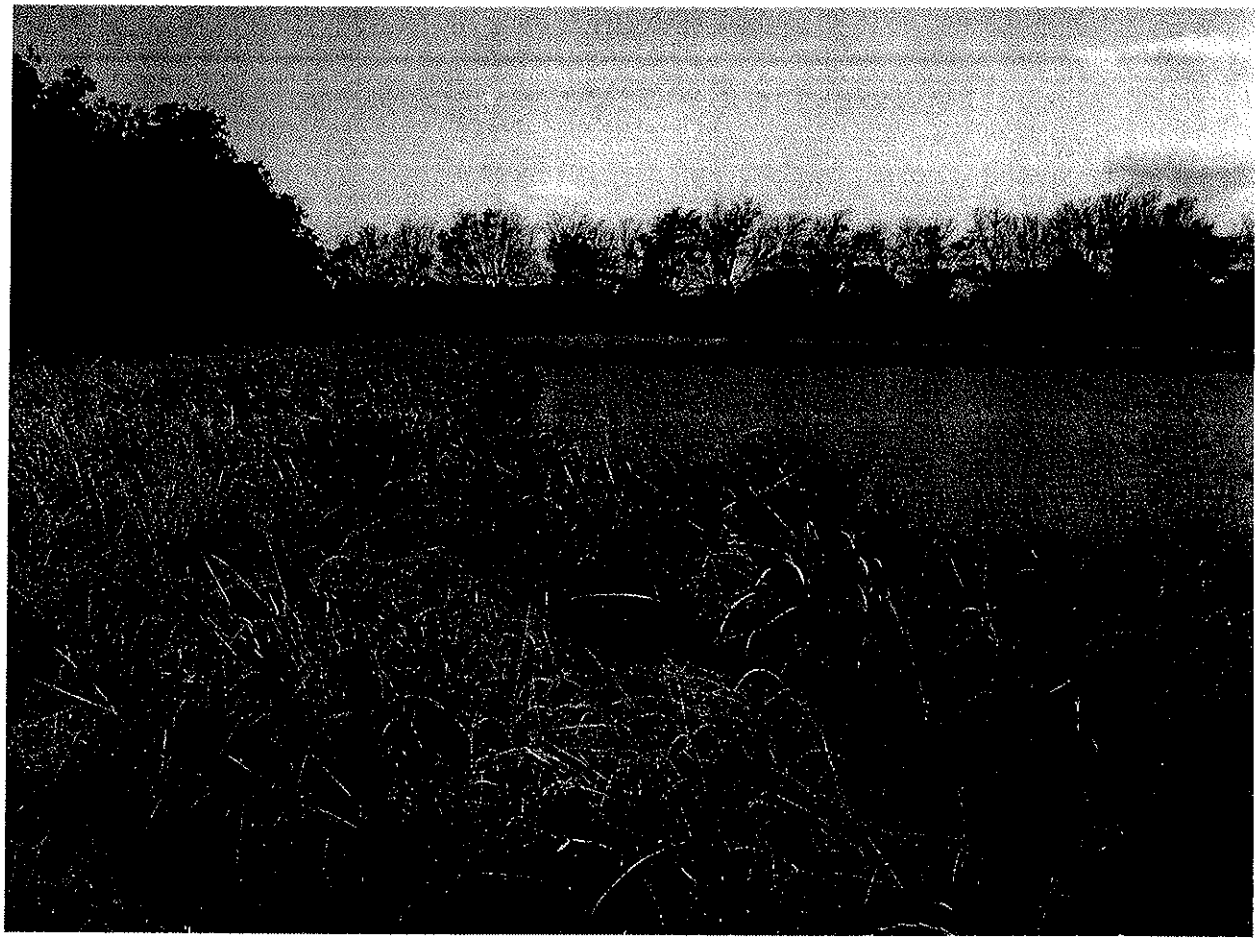
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:22 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Overgrown pond bank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 3 of 7

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:22 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Overgrown pond bank

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 4 of 7

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:26 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Overgrown pond bank

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log
Photo: 5 of 7

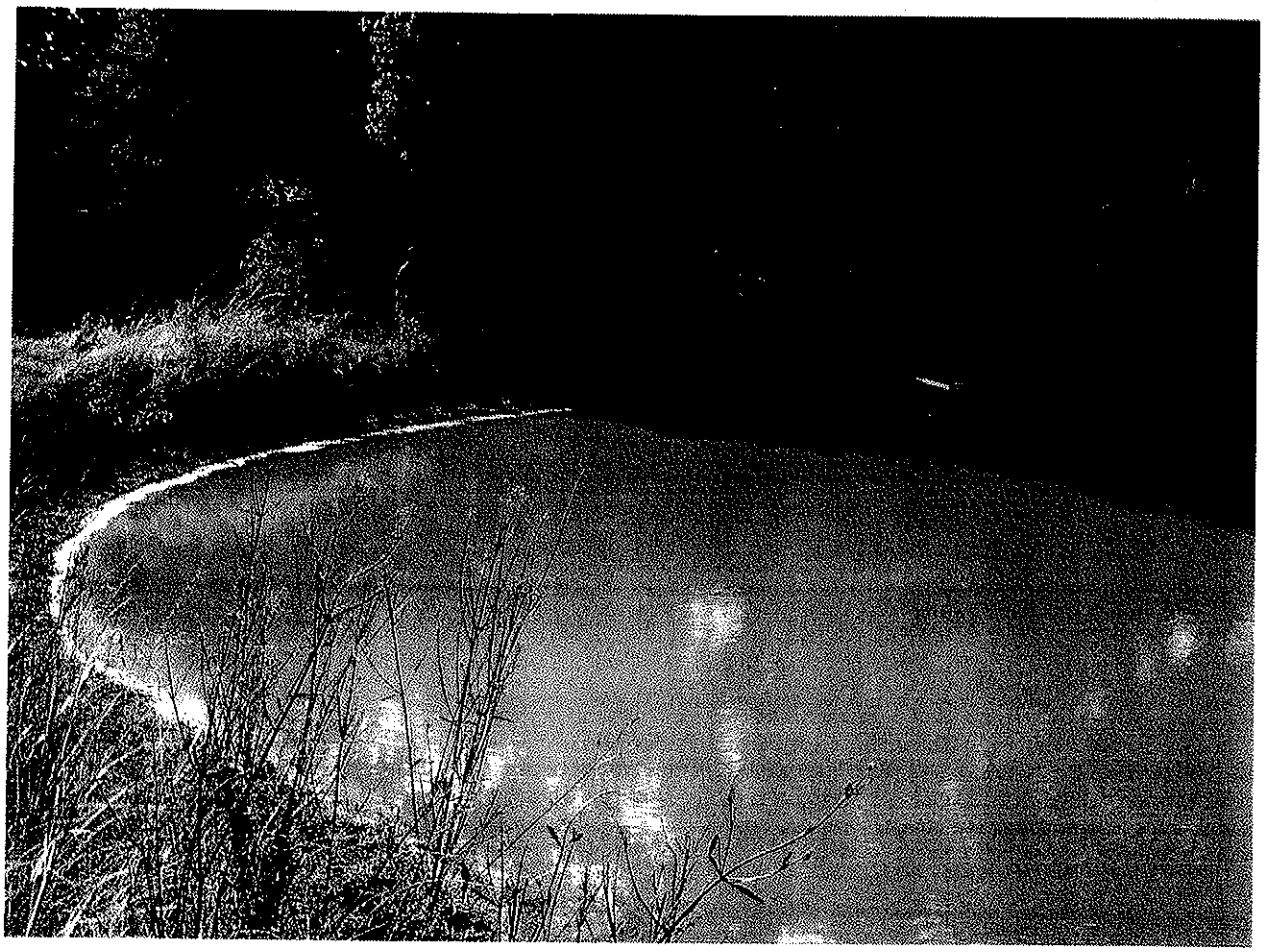
All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:29 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Pond outlet to discharge point



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 6 of 7

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:30 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Pond outlet to discharge point

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Official Photograph Log

Photo: 7 of 7

All images were generated/saved using: Olympus Stylus 720 SW, Region 6 Number S41133

Photographer: Robert Houston **Date:** June 11, 2012 **Time:** 5:33 PM

Location: Bayou Galion **City/County:** Mer Rouge **State:** Louisiana

Weather: 97.0 °F **Conditions:** Mostly Cloudy

Subject: Pond outlet to discharge point